

EXHIBIT 2

11/23/2020
TYLER BATES

Dear TYLER,

Welcome to Nalco Water, an Ecolab Company!

We are pleased to confirm our offer of employment to you with Nalco Company LLC ("Ecolab"). By joining the Ecolab team, you can help take on some of the world's most meaningful challenges, delivering critical insights and innovative solutions to help our customers achieve clean water, safe food, abundant energy and healthy environments. With our worldwide reach and ambitious growth plans, you will have the opportunity to own your future and impact what matters.

In your new position of District Representative III - NW, you will be reporting to Lilton Moore.

Start Date

Your target start date is 01/04/2021. Please note that your official start date will be determined after ALL post-offer screens have been completed, reviewed, and determined that they meet our hiring criteria. You will be sent additional information regarding your first day.

Annual Salary/Base Compensation

[REDACTED]

This position includes a salary package intended to compensate you for all hours worked.

Training Incentive Bonus

In addition to your salary you will be eligible for a one-time bonus payment of [REDACTED] upon successful completion of the initial training program. Successful completion of the initial training program includes the following:

1. Documented completion of all assigned technical, sales and safety training lessons within a specified time period signed-off from your primary trainer and District Manager.
2. Achievement of passing scores on the final technical exam and demonstrated proficiency in supporting customer's needs which your Manager will assess.
3. Successful completion of New Sales Engineer Conference, which you will attend upon completion of your technical lessons.

If you do not successfully complete the initial training program, you will have one opportunity to re-take the exam(s) and the onetime bonus payment will be [REDACTED]

Once your training has been satisfactorily completed you will be eligible for our Sales Incentive Plan ("SIP") with a target incentive based on [REDACTED]

Nov 23, 2020 3:12 PM

Vacation

You are eligible to accrue 12 business days of vacation per year. Vacation will be accrued monthly, for each month of service completed.

Company Vehicle

You will qualify for the Fleet company vehicle program designed to provide a vehicle fit for job responsibility use. Please review the Driver Safety Policies and Procedures. Your manager will discuss this program with you in more detail.

Post-Offer Contingencies

This offer is contingent upon the successful completion and satisfactory results of one or more of the following post-offer screens: controlled substance test, criminal background screen, education verification, physical examination, employment history verification, DOT safety performance history, and/or an acceptable motor vehicles report. Ecolab uses third party vendors to conduct these post-offer screens. You will be provided additional instructions for initiating the post-offer screens that are applicable to you based on the role you have been offered.

Your hire will be dependent on you initiating and successfully completing all post-offer screens and controlled substance test within **three (3) business days** from the date of initial contact by the vendor. **Failure to follow this timeline will result in the rescission of this offer.** You must bring a picture ID with you to your appointment(s). If you are unable to complete any of these post-offer screens in the time allotted, please contact me as soon as possible.

Ecolab Associate Resolution Mediation and Arbitration

Ecolab uses mediation and arbitration to resolve disputes related to the employer/employee relationship. As a condition of employment all Ecolab employees are required to sign an Ecolab Mediation and Arbitration Agreement. Ecolab Associate Resolution Resources provide an easy to use method for economical and prompt dispute resolution. As a condition of employment, we require your electronic signature on our Mediation and Arbitration Agreement which outlines the Ecolab Associate Resolution Resources and the use of mediation and/or arbitration as the means to settle legal disputes related to your employment with Ecolab, when those disputes cannot be mutually resolved without legal intervention. Please access the document in your candidate account to review, electronically sign and submit the document prior to employment. Please retain a copy of the signed Agreement for your records. Your employment with Ecolab cannot begin until you have signed the Mediation and Arbitration Agreement. Please contact me to request a paper copy of this agreement to sign and return in lieu of an electronic signature.

Employment Agreement

To protect our business interests, and as a condition of employment, Ecolab will require your electronic signature on an employment agreement. Please access the document in your candidate account to review, electronically sign, and submit the document prior to employment. Please retain a copy of the signed employment agreement for your records. Your employment with Ecolab cannot begin until you have signed the employment agreement. Please contact me to request a paper copy of this agreement to sign and return in lieu of an electronic signature.

Employment at Will

Nov 23, 2020 3:12 PM

As stated in the employment application, we recognize that you retain the option, as does the Company, of ending your employment with the Company at any time, with or without notice and with or without cause. As such, your employment with the Company is at will and neither this letter nor any other oral or written representations may be considered a contract for any specific period of time.

Required Employment Eligibility Agreement

As part of our employee documentation process, and in line with the government's Immigration Reform and Control Act of 1986, Ecolab is required to verify documents that indicate your right to work in the U.S. On your first day of employment, you must supply Ecolab with the original document(s) you intend to use to verify this information. A receipt for the application of these required documents is also acceptable with the original documents to follow in 90 days from your start date. Without this information, we are not allowed to hire you. If you have questions about which documents will be accepted, please refer to U.S. Citizenship and Immigration Service website at <https://www.uscis.gov/i-9-central/acceptable-documents>

Ecolab complies with the reporting requirements of the Social Security Administration (SSA). We are required to use the name you have registered with the SSA in our personnel and payroll records. Our records must reflect exactly what is printed on your Social Security Card. If there is a discrepancy, you must correct the discrepancy directly with the SSA. Please contact your local SSA office or call SSA at 1-800-772-1213 for further instruction. All offers of employment at Ecolab are contingent upon an individual's ability to secure and maintain legal work authorization in the United States.

Benefits and Programs

As a full-time employee, you are eligible for the comprehensive benefits package and employee programs. Benefits will be effective retroactive to your **first day of employment** following the completion of your web-based enrollment on Ecolab's *My Benefits* website. Please review the [Benefits Guide](#) for detailed information regarding company benefits.

You will have 31 days from your date of hire to enroll in your benefits. You can enroll in your benefits prior to receiving your Benefits Enrollment packet. Benefit Enrollment information is also available on the *My Benefits* website at mybenefits.us.ecolab.com. You will have access to the website within 4 business days following your hire (or start) date. The *Benefits Guide* can be found under "Learn About My Benefits" on the *My Benefits* home page. Please see the *How to Enroll* section of the *Benefits Guide* for information to assist you in the enrollment process. Enrollment can be processed online via the website, or over the phone with the Ecolab Benefits Center at **800-964-0265**. Representatives are available to assist you from 7:00 a.m. and 7:00 p.m. Central time, Monday through Friday.

At Ecolab, we believe that our associates are the key to our company's future. We are committed to a culture that fully leverages our associates' talents by promoting an environment where all associates can learn and grow, make an impact, and be rewarded for their contributions.

Congratulations on your new opportunity with Ecolab.

Best Regards,

Laurel Burkett
Ecolab Talent Acquisition

Nov 23, 2020 3:12 PM

Service Plan: 2004

CUSTOMER INFORMATION

CUSTOMER NAME		PRIMARY CUSTOMER CONTACT	
SITE ADDRESS		TELEPHONE NUMBER	
CUSTOMER NUMBER & SHIP-TO NUMBER		ALTERNATE CUSTOMER CONTACT	
CONTRACT NUMBER & EXPIRATION DATE		ALTERNATE CUSTOMER CONTACT	

NALCO SERVICE CONTACTS

PRIMARY SERVICE REPRESENTATIVE		TELEPHONE NUMBER	
BACKUP SERVICE REPRESENTATIVE		TELEPHONE NUMBER	
DISTRICT MANAGER		TELEPHONE NUMBER	

SERVICE CALL FREQUENCY & DETAILS

SCHEDULED SERVICE TASKS & APPLICATIONS	ADDITIONAL INSTRUCTIONS OR INFORMATION	Schedule of Services by Month (Gray Shading = Completed)											
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
		X	X	X	X	X	X	X	X	X	X	X	X
			X		X		X		X		X		X
		X	X	X	X	X	X	X	X	X	X	X	X
		X	X	X	X	X	X	X	X	X	X	X	X
		X	X	X	X	X	X	X	X	X	X	X	X
		X			X			X			X		
								X					
		As-Scheduled											
		X	X	X	X	X	X	X	X	X	X	X	X
				X									
									X				
										X			
						X							
								X					
		X		X		X		X		X		X	
					X						X		
		X	X	X	X	X	X	X	X	X	X	X	X
		X	X	X	X	X	X	X	X	X	X	X	X
		X	X	X	X	X	X	X	X	X	X	X	X
								X					
		As-Needed											
					X						X		

IMPROVEMENT PROJECT SUMMARY

Project	Completion Date	Description	Benefit / Value	Status

Signature, Nalco Company's Representative

Date

Signature, Customer's Representative

Date

PERSONAL SERVICE REPORT COOLING WATER REPORT

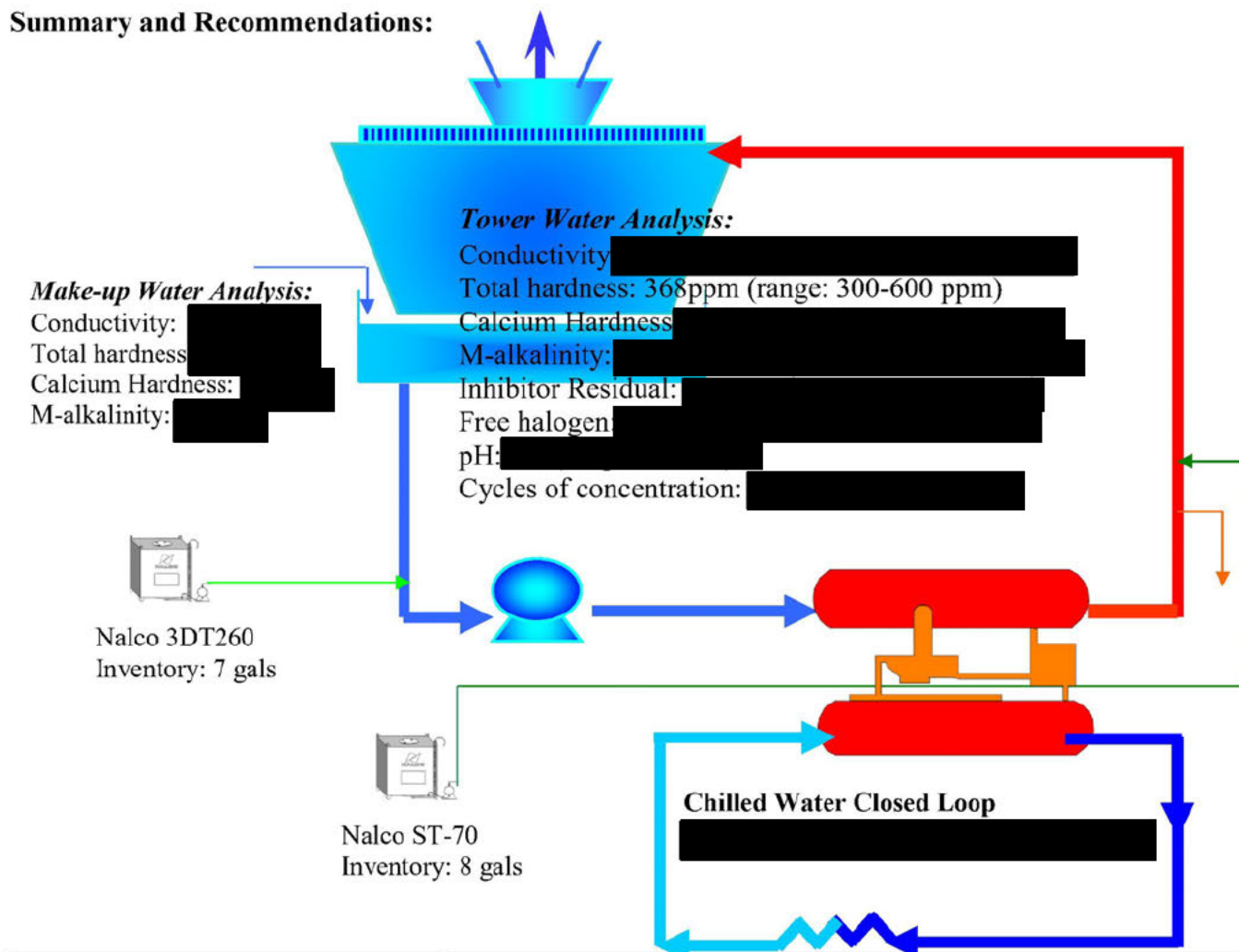


Plant of: [REDACTED] Date: February 1, 2013
 Address: [REDACTED] Plant: Facilities
 City: [REDACTED] State: TN Zip: 37402 Country: [REDACTED]
 Attention: [REDACTED]
 Copy to: Facility Maintenance
 NALCO Copy to: Anthony Ridley, Nalco Files

Purpose of Service Visit:

The purpose of the visit was to complete normal service, in accordance with Nalco's service plan, for [REDACTED] facility. Analytical analysis was performed on samples collected from the cooling tower sump, closed loop and make-up water. The results from the water analyses will provide insight into the statutes of the water treatment program, and give guidance to what adjustments are necessary, if any. In addition to the analytical analyses, the operation of the water treatment equipment was checked. Maintaining the water treatment program is a key part in preventing scale formation, high corrosion rates, and limiting microbiological growth. The Total Cost of Operation (TCO) is decreased when a cooling water system is well protected, thus providing a Return on Investment (ROI) to your water treatment cost. Please note the following conditions and recommendations for improvement.

Summary and Recommendations:



Signed: Chris Rogers Title: Application Engineer	Mobile: (865) 389-6062 Email: [HYPERLINK "mailto:cdrogers@nalco.com"]	District: WP-127
Nalco Chemical Company	6259 Park South Drive Suite 102	Bessemer, AL 35022 Phone: (205) 426-5454

PERSONAL SERVICE REPORT COOLING WATER REPORT

Plant of: [REDACTED] Date: February 1, 2013
 Address: [REDACTED] Plant: Facilities
 City: [REDACTED] State: TN Zip: 37402 Country: _____
 Attention: [REDACTED]
 Copy to: Facility Maintenance
 NALCO Copy to: Anthony Ridley, Nalco Files

Service Visit Notes:

All the test results, on the collected samples, were within the normal operating parameters. Based upon the test results, the system appears to be protected from mineral scale formation, high corrosion rates and excessive microbiological growth. Limiting these system stress will increase the likelihood the system's efficiency will remain high.

Please be sure that the following tasks are preformed everyday:

- Logsheets are completed daily.
- Conductivity Controller is checked for alarms
- Chemical feed pumps have power and are plugged into the proper outlet
- Check chemical feed pumps to ensure there are no leaks

If there you have any questions or concerns, please contact Anthony Ridley (Nalco Account Manager) at (423) 322-9506 or Chris Rogers (Nalco Service Engineer) at (865) 389-6062.

Thank you for allowing Nalco to serve you.

Signed: Chris Rogers Title: Application Engineer	Mobile: (865) 389-6062 Email: [HYPERLINK "mailto:cdrogers@nalco.co m"]	District: WP-127
Nalco Chemical Company	6259 Park South Drive Suite 102	Bessemer, AL 35022 Phone: (205) 426-5454

Document Metadata Report

Bates Beg	PLAINTIFFSR-000001225
File Name	[REDACTED] 02 01 13.docx
Author	Nalco
Company Name	
Confidential	HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY
Date Created	3/20/2013
Date Last Saved	
Document Extension	docx
Document Folder Path	Ridley, Anthony\ [REDACTED] _1\ [REDACTED] _1.pst\Top of Personal Folders\Archive
File Type	Microsoft Word 2010/2011
MD5 Hash	62def5a0a29698452aa5bdfd9f3adaef
Original File Extension	docx
Relativity Native Type	



The native file does not exist for this document.

Document Metadata Report

Bates Beg	PLAINTIFFSR-000001235
File Name	Transition Playbook.docx
Author	Frank Sospenzi
Company Name	
Confidential	HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY
Date Created	1/9/2015
Date Last Saved	
Document Extension	docx
Document Folder Path	Ridley, Anthony\ transition playbook_1\ transition playbook_1.pst\Top of Personal Folders\Archive
File Type	Microsoft Word 2010/2011
MD5 Hash	70711d0e4cf5529d659aecefc1134209
Original File Extension	docx
Relativity Native Type	



The native file does not exist for this document.

Document Metadata Report

Bates Beg	PLAINTIFFSR-000001242
File Name	[REDACTED] Water Treatment Contract Jan - June 2015.pdf
Author	Nalco
Company Name	
Confidential	HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY
Date Created	2/19/2015
Date Last Saved	
Document Extension	pdf
Document Folder Path	Ridley, Anthony\ [REDACTED] _1\ [REDACTED] _1.pst\Top of Personal Folders\Archive
File Type	Adobe Acrobat (PDF)
MD5 Hash	1b4d7ebbef1152d95186e8bdbdc93c3d
Original File Extension	pdf
Relativity Native Type	



The native file does not exist for this document.

Expense Report
Report Name : PAC 1 Training - WL121

Employee Name : Ridley, Anthony
Employee ID : 00116331
Company : 1001 NALCO US

Report Header

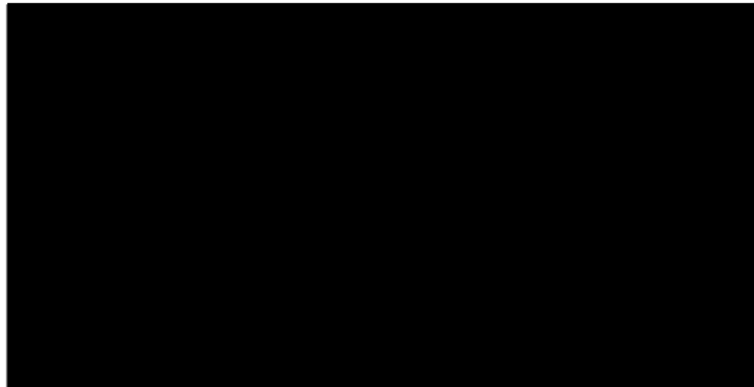
Policy : NA NALCO Expense Policy
***NC-Org Unit 1-Company :** 1001 NALCO US
Business Purpose : PAC 1 Training
Report Date : 08/29/2016
Approval Status : Not Submitted
Currency : US, Dollar
Report Id : 2B34886575DB4B648B23

Business Meal (Employees)

Transaction Date	Expense Type	Business Purpose	Vendor	Merchant Name	City	Payment Type	Foreign Amount	Amount
08/17/2016	Business Meal (Employees)		URBAN STACK BURGER	URBAN STACK BURGER	Chattanooga	US Bank Mastercard	\$242.29	\$242.29

Allocations : 100.00% (\$242.29) 1001-0000052020-1001-00116331

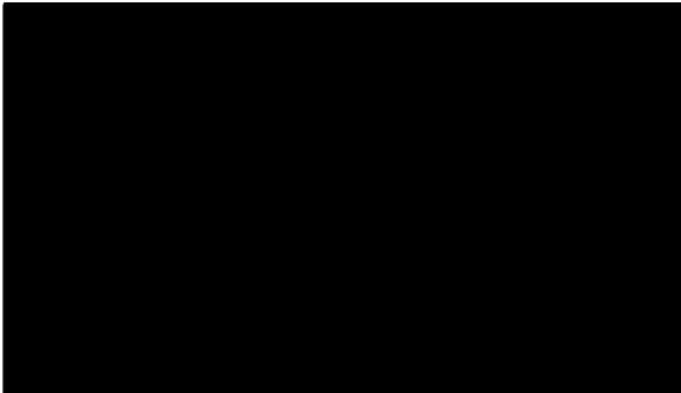
Attendees :



08/16/2016	Business Meal (Employees)		MELLOW MUSHROOM CHATTA	MELLOW MUSHROOM CHATTA	Chattanooga	US Bank Mastercard	\$259.59	\$259.59
------------	---------------------------	--	------------------------	------------------------	-------------	--------------------	----------	----------

Allocations : 100.00% (\$259.59) 1001-0000052020-1001-00116331

Attendees :



08/16/2016	Business Meal (Employees)	BIG RIVER CHATTANOOGA	BIG RIVER CHATTANOOGA	Chattanooga	US Bank Mastercard	\$484.82	\$484.82
------------	---------------------------	-----------------------	-----------------------	-------------	--------------------	----------	----------

Allocations : 100.00% (\$484.82) 1001-0000052020-1001-00116331

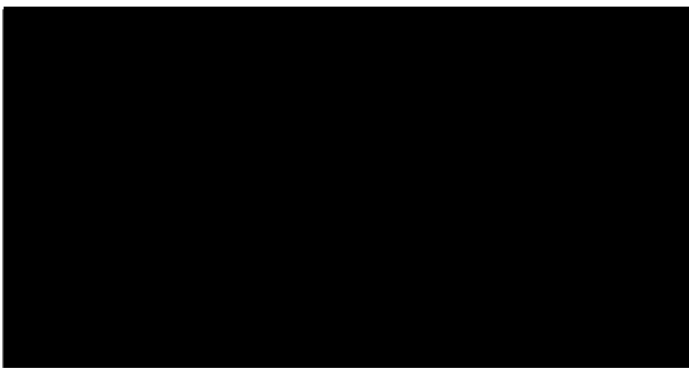
Attendees :



08/15/2016	Business Meal (Employees)	FOOD CITY #724	FOOD CITY #724	Dayton	US Bank Mastercard	\$82.58	\$82.58
------------	---------------------------	----------------	----------------	--------	--------------------	---------	---------

Allocations : 100.00% (\$82.58) 1001-0000052020-1001-00116331

Attendees :



Room Rate

Transaction Date	Expense Type	Business Purpose	Vendor	Merchant Name	City	Payment Type	Foreign Amount	Amount
08/18/2016	Room Rate	PAC 1 Training	SPRINGHILL SUITES BY M	SPRINGHILL SUITES BY M	Chattanooga	US Bank Mastercard	\$2,126.26	\$2,126.26

Conference / Meeting Room

Transaction Date	Expense Type	Business Purpose	Vendor	Merchant Name	City	Payment Type	Foreign Amount	Amount
• 08/17/2016	Conference / Meeting Room	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$300.00	\$300.00

Allocations : 100.00% (\$300.00) 1001-0000052020-1001-00116331

• 08/16/2016	Conference / Meeting	PAC 1 Training	SPRINGHILL SUITES BY M			US Bank Mastercard		
--------------	----------------------	----------------	------------------------	--	--	--------------------	--	--

Room	Chattanooga	\$300.00	\$300.00
------	-------------	----------	----------

Allocations : 100.00% (\$300.00) 1001-0000052020-1001-00116331

Hotel Tax

Transaction Date	Expense Type	Business Purpose	Vendor	Merchant Name	City	Payment Type	Foreign Amount	Amount
• 08/17/2016	Hotel Tax	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$46.73	\$46.73

Allocations : 100.00% (\$46.73) 1001-0000052020-1001-00116331

• 08/16/2016	Hotel Tax	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$46.73	\$46.73
--------------	-----------	----------------	------------------------	--	-------------	--------------------	---------	---------

Allocations : 100.00% (\$46.73) 1001-0000052020-1001-00116331

• 08/16/2016	Hotel Tax	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$150.40	\$150.40
--------------	-----------	----------------	------------------------	--	-------------	--------------------	----------	----------

Allocations : 100.00% (\$150.40) 1001-0000052020-1001-00116331

Meeting Food & Beverage

Transaction Date	Expense Type	Business Purpose	Vendor	Merchant Name	City	Payment Type	Foreign Amount	Amount
• 08/17/2016	Meeting Food & Beverage	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$205.20	\$205.20

Allocations : 100.00% (\$205.20) 1001-0000052020-1001-00116331

• 08/16/2016	Meeting Food & Beverage	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$205.20	\$205.20
--------------	-------------------------	----------------	------------------------	--	-------------	--------------------	----------	----------

Allocations : 100.00% (\$205.20) 1001-0000052020-1001-00116331

Room Rate

Transaction Date	Expense Type	Business Purpose	Vendor	Merchant Name	City	Payment Type	Foreign Amount	Amount
• 08/16/2016	Room Rate	PAC 1 Training	SPRINGHILL SUITES BY M		Chattanooga	US Bank Mastercard	\$872.00	\$872.00

Allocations : 100.00% (\$872.00) 1001-0000052020-1001-00116331

Note: The sum of allocation amounts may not exactly match the expense amount due to rounding.

Report Total :	\$3,195.54
Personal Expenses :	\$0.00
Total Amount Claimed :	\$3,195.54
Amount Approved :	\$3,195.54

Company Disbursements

Amount Due Employee :	\$0.00
Amount Due Company Card :	\$3,195.54
Total Paid By Company :	\$3,195.54

Employee Disbursements

Amount Due Company :	\$0.00
Amount Due Company Card From Employee :	\$0.00
Total Paid By Employee :	\$0.00

NALCO

An Ecolab Company

Nalco Company

6259 Park South Drive

Suite 102

Bessemer, AL 35022

Office: (205) 426-5454

Mobile: (423) 322-9506

Fax: (205) 449-1517

Email: aridley@nalco.com**QUOTATION**

TO:



Date: [DATE \@ "MMMM d, yyyy"]

QUANTITY	ITEM	DESCRIPTION	UNIT PRICE	UNITS	LINE TOTAL
1	Nalco 3DT260.33	Nalco 3DT260: cooling tower scale and corrosion inhibitor: Bulk Tank #C33104			

Total

Quoted Unit Price does includes freight

Quoted Total Price does not include taxes

Standard lead time, once order is placed - 10 days

Quotation prepared by: Anthony Ridley – District Manager

THANK YOU FOR YOUR BUSINESS!

Document Metadata Report

Bates Beg	PLAINTIFFSR-000001415
File Name	Quote for 3DT260.33 06.10.2015.docx
Author	aridley
Company Name	
Confidential	HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY
Date Created	6/10/2015
Date Last Saved	
Document Extension	docx
Document Folder Path	Ridley, Anthony\Chemtreat - Ridley 2020 email_2\Chemtreat - Ridley 2020 email_2.pst\Top of Personal Folders\Archive
File Type	Microsoft Word 2010/2011
MD5 Hash	58b1b756a5ca3cc0d1d50901459de607
Original File Extension	docx
Relativity Native Type	



The native file does not exist for this document.

Value Creation & Documentation

CSP Review &

Role Play Set up



For the Presenter: The purpose of this deck is to pull all of the components of the Nalco cooling water offering together. It's to help the sales engineers practice the skills needed to make calls on competitively-held business. It recognizes that there are a number of first sales calls that can be made on any one prospect. It projects Nalco's customer experience onto our prospects.

There are speakers' notes on every slide to help facilitate the discussion.

Make it fun!

Make it interactive! Get the audience involved!

Role Play – District Breakout

▲ **Purpose:** To practice sales skills and prep for your upcoming value communication sales call

▲ **Process:**

Use your Customer Facing selected scenario from yesterday

Break up into teams of three

- Sales Rep/Customer/Observer
- Use your Customer project calculations
- Conduct the role plays
- Score the role play
- Give specific feedback (1 thing that went well and what could be better)

▲ **Payoff:** You will be better prepared and more confident to conduct your next Value Communication call

NALCO Water
An Ecolab Company

Let's transition to the role plays.

This is your SAFE zone to practice, so you are comfortable with the words coming out of your mouth.

Above all, have FUN



NALCO Water
An Ecolab Company

What Objections will you hear?

NALCO Water
An Ecolab Company

Work through each of the above Ben Duffy Questions. Ask your audience for more and write them on a flipchart. Ask the audience [REDACTED] If no, ask them why not.

Add a personal story or anecdote that reinforces the idea of delivering structured Business Reviews in person. I relay a story of

[REDACTED]

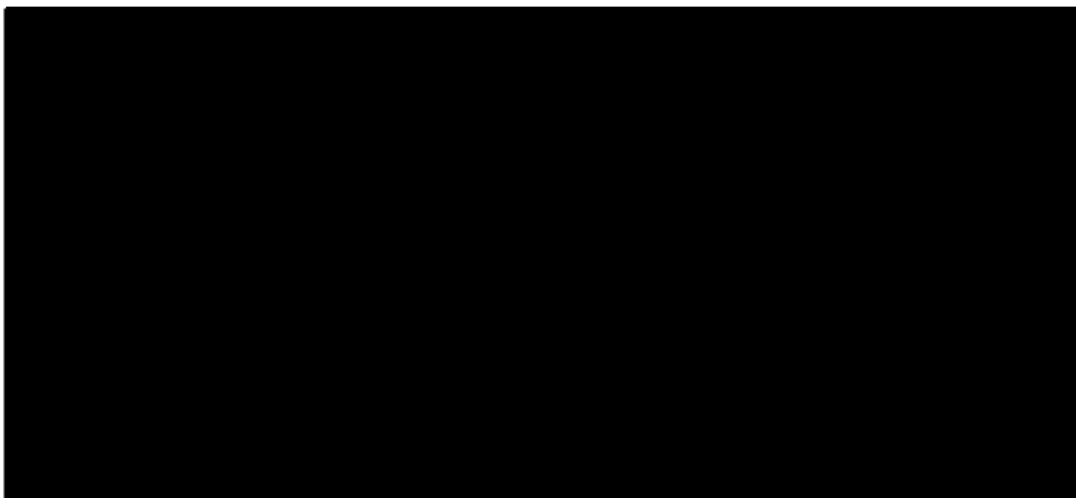
"If we have data, let's look at data. If all we have are opinions, let's go with mine."

Jim Barksdale, former Netscape CEO

"The most valuable commodity I know of is information."

- Gordon Gekko, Wall Street (1987)

What Objections will you hear?



NALCO Water
An Ecolab Company

Work through each of the above Ben Duffy Questions. Ask your audience for more and write them on a flipchart. Ask the [REDACTED] If no, ask them why not.

Add a personal story or anecdote that reinforces the idea of delivering structured Business Reviews in person. I relay a story of [REDACTED]

"If we have data, let's look at data. If all we have are opinions, let's go with mine."

Jim Barksdale, former Netscape CEO

"The most valuable commodity I know of is information."

- Gordon Gekko, Wall Street (1987)

LSCPA

Steps to Overcome Objections



Role Play – District Breakout

▲ **Purpose:** To practice sales skills and prep for your upcoming value communication sales call

▲ **Process:**

Use your Customer Facing selected scenario from yesterday

Break up into teams of three

- Sales Rep/Customer/Observer
- Use your Customer project calculations
- Conduct the role plays
- Score the role play
- Give specific feedback (1 thing that went well and what could be better)

▲ **Payoff:** You will be better prepared and more confident to conduct your next Value Communication call

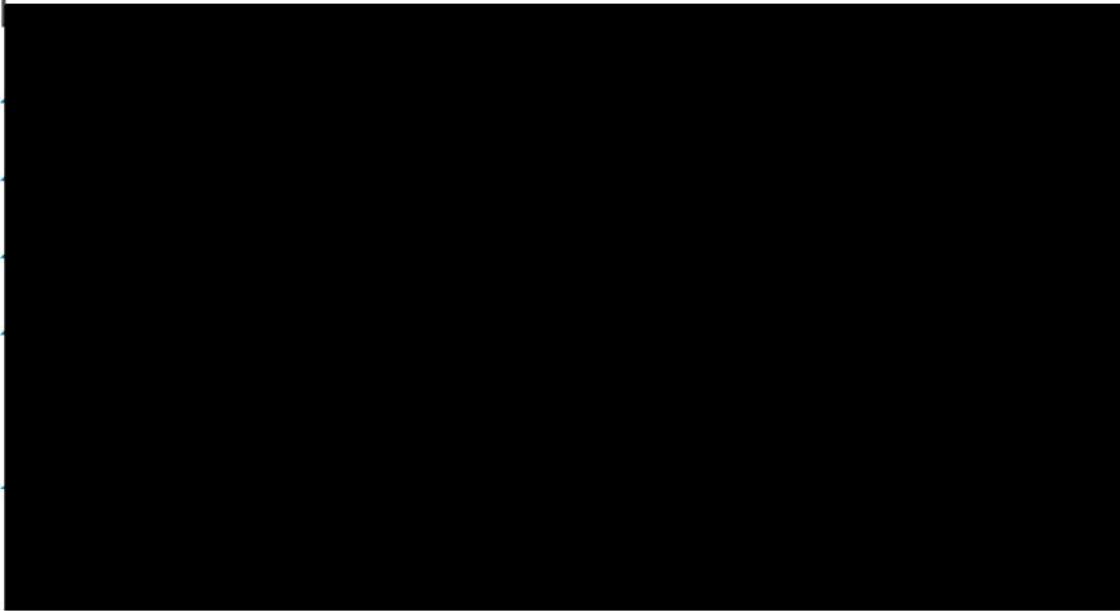
NALCO Water
An Ecolab Company

Let's transition to the role plays.

This is your SAFE zone to practice, so you are comfortable with the words coming out of your mouth.

Above all, have FUN

Summary



NALCO Water
An Ecolab Company

8

As the Nike slogan goes - Just do it!

Account Leadership Role Play Scorecard

ROLE PLAY (Service Plan, Report or Business Review): _____

SALES REPRESENTATIVE NAME: _____

Note which skills were used and how effectively they were used. Write down your suggestions for any improvements.

	<i>Used?</i>	<i>Effectiveness?</i> (Low High)
PPP	<input type="checkbox"/>	1 2 3 4 5
Checking Question – is PPP agreeable?	<input type="checkbox"/>	1 2 3 4 5
Reduce relationship tension	<input type="checkbox"/>	1 2 3 4 5
Ben Duffy used – empathy displayed	<input type="checkbox"/>	1 2 3 4 5
Does Rep express idea that program results are a shared responsibility ?	<input type="checkbox"/>	1 2 3 4 5
Does Rep discuss risk or consequences of a problem in a direct and transparent way?	<input type="checkbox"/>	1 2 3 4 5
Identifies social style of customer and adjust approach	<input type="checkbox"/>	1 2 3 4 5
<div style="background-color: black; width: 200px; height: 20px;"></div>	<input type="checkbox"/>	1 2 3 4 5
Does Rep say “no” when he should say “yes, if...” when required?	<input type="checkbox"/>	1 2 3 4 5
Identify and address task motives	<input type="checkbox"/>	1 2 3 4 5
Identify and address personal motives	<input type="checkbox"/>	1 2 3 4 5
Does rep demonstrate the use of LSCPA to respond to objections?	<input type="checkbox"/>	1 2 3 4 5
Does Rep achieve an acknowledgement of shared responsibility if the context of overall program goals?	<input type="checkbox"/>	1 2 3 4 5
Observer’s pick – additional skill :	<input type="checkbox"/>	1 2 3 4 5

TOTAL SCORE:

Suggested improvements:

Service report technical notes:

The focus of the service visit was to perform analyses on water samples collected from the boiler pre-treatment, boiler, and condensate return. The results from the water analyses will help ensure the water treatment is maintained within the proper ranges. In addition to the analytical analyses, the operation of the water treatment equipment was checked. The payoff of these completed tasks is to ensure the boilers and steam system is protected from deposit formation (example: calcium carbonate) and corrosion (example: general or oxygen pitting). The Total Operating Cost (TOC) is decreased when a boiler system is well protected. Thus providing a Return on Investment (ROI) to your water treatment cost

Boiler -

The focus of the visit was to perform analytical analyses on water samples collected from the boiler's pre-treatment systems (softener and deaerator), boiler and condensate return. The results from the water analyses will provide insight into the condition of the steam generation system, how well the water treatment program is being maintained and give guidance to what adjustment are necessary, if any. In addition to the analytical analyses, the operation of the water treatment equipment was checked. The payoff of these completed tasks is to help ensure the boiler and steam system are protected from deposit formation (example: calcium carbonate) and corrosion (example: general or oxygen pitting). The Total Cost of Operation (TCO) is decreased when a boiler system is well protected, thus providing a Return on Investment (ROI) to your water treatment cost.

Cooling Tower -

The purpose of the visit was to complete normal service in accordance with Nalco's service plan for () facility. Analytical analysis was performed on samples collected from the cooling tower sump and tower make-up. The results from the water analyses will provide insight into the statues of the water treatment program, and give guidance to what adjustment are necessary, if any. In addition to the analytical analyses, the operation of the water treatment equipment was checked. Maintaining the water treatment program is a key part in preventing scale formation, maintaining low corrosion rates and limiting microbiological growth. The Total Cost of Operation (TCO) is decreased when a cooling water system is well protected, thus providing a Return on Investment (ROI) to your water treatment cost. Please note the following conditions and recommendations for improvement.

NexGuard Residual:

Conductivity of water in the boiler: The conductivity or dissolved solids in the boiler was above the recommended range for normal operation. The high conductivity was due to the conductivity controller being out of calibration. **Corrective Action:** The conductivity controller was calibrated to ensure proper control.

Low Condensate pH: The pH of the condensate return sample was below the recommended range for good corrosion protection. The active ingredients, in Nalco 1820, increase the pH of the condensate above 8.2, which neutralizes any carbonic acid that may have formed. When steam laden with carbon dioxide starts to condense, some carbon dioxide dissolves in the condensate, forming carbonic acid. Carbonic acid is a major cause of condensate corrosion. Limiting potential condensate corrosion will extend equipment life and prevent unnecessary downtime and loss production. **Corrective Action:** The rate of feed on the Nalco 1820 chemical pump was increased by 10%.

Low Cycles of Concentration: The water sample collected from Boiler #1 had a conductance just below the normal operating range. Compared to an achievable number of boiler cycles as a baseline, operating a

boiler at lower cycles of concentration will increase the amount of fuel, water, and chemicals consumed by the boiler, to produce the required amount of steam. **Corrective Action:** The rate of flow on the surface blowdown line was reduced.

Sulfite Residuals in Boilers: The sulfite residual, in Boiler #1 and Boiler #2, was below the normal recommended operating range. NALCO 1720 (catalyzed, liquid sulfite) scavenges any oxygen remaining, in the storage section of the deaerator, after mechanical deaeration has occurred. Removing all the oxygen from the feedwater helps prevent oxygen corrosion, in the boiler and condensate system. Lower corrosion rates translate directly into lower boiler maintenance costs and reduction of boiler downtime. **Corrective Action:** The Nalco 1720 feed to both boilers was increased by 10%.

Low Sulfite Residual: The sulfite residual, in the boilers, was below the recommended range. Nalco 1720 (catalyzed sodium sulfite) is injected into the deaerator to chemically scavenge any oxygen remaining after mechanical deaeration has occurred. If oxygen is not eliminated from the feedwater, it can cause severe localized corrosion, in the boiler and condensate. The extensive localized corrosion caused by oxygen can quickly caused equipment failure and unforeseen downtime. **Corrective Action:** The rate of feed on the Nalco 1720 chemical pump was increased by 10%.

Low conductivity of water in boiler: The conductivity of the boiler water was below the recommended limits. Operating a boiler at lower cycles of concentration, than recommended, will increase the amount of fuel, water, and chemicals used to produce the required amount of steam. The low conductivity of the boiler caused the sulfite residual to be below the normal range. **Corrective Action:** The probe was cleaned and the unit was calibrated.

High Levels of Hardness in Boiler Pre-Treatment: The samples obtained from the boiler's feedwater tank and softener effluent contained very high levels of hardness. It appears the softeners are removing little to no hardness. High levels of hardness in the boiler feedwater will result in the formation of scale deposits, and will reduce system efficiency while increasing chemical usage (Nalco NexGuard). If no action is taken to correct the issue, excessive scale formation could cause boiler tube failure. **Corrective Action:**

Low Halogen Residual: The analytical analysis, on the cooling tower's bulk water sample, showed a halogen residual below the recommended range, for optimum microbiological control. [REDACTED]

[REDACTED] The purpose of a cooling water bio-control program is to help our customers control the growth of micro-organisms (bacteria, algae, fungi and protozoa) in cooling water systems. These organisms can cause serious problems including loss of heat transfer efficiency, corrosion, flow restriction, and public health issues. Cause of the Low Halogen Level: **Corrective Action:**

The purpose of a cooling water bio-control product line is to help our customers control the growth of micro-organisms (bacteria, algae, fungi, and protozoa) and macro-organisms (eg. mussels and clams) in cooling water systems. These organisms can cause serious problems including loss of heat transfer efficiency, corrosion, flow restriction, and public health issues. The product line consists of oxidizing and non-oxidizing biocides, 3D TRASAR BioReporter, detoxification agents, and biodispersants and biodegradants.

NOTE: Bromine is more aggressive to certain organic phosphates (HEDP in particular) than chlorine at equivalent dosages, but because it is controlled at lower residuals, the effect is minimized. Remember, when using unstabilized bromine chemistry with HEDP (all organic) programs, that the free available oxidant must be less than 0.2 ppm. **Do not overfeed bromine.**

High Conductivity: The conductivity of the cooling tower's bulk water was above the normal operating range. The recommended range is established to provide the optimal operation conditions for the cooling water system based upon make-up water characteristics, mineral balance, system stresses, and selected chemical treatment program. Operating the tower outside any of these parameters could increase the possibility of scale formation or increase the corrosion rates of the metals present in the system. **Corrective**

Action: The conductivity controller was calibrated. After calibration, the solenoid valve was opened, and the system began blowing down. This will make room, in the system, for lower conductivity make-up water, which will lower the over-all conductivity of the system.

Conductivity is a measure of the dissolved solids in water. It is typically used to control blow down and maintain a desired tower cycling. As the concentration of dissolved solids increases, conductivity increases. If uncontrolled, these dissolved solids precipitate out of solution to form scale deposits. Deposition/Scaling results in decreased plant efficiency, reduced productivity, schedule delays, more downtime for maintenance, and increased costs for equipment repair and replacement, all of which directly lead to higher operating costs and decreased profitability. Frequent blowdown results in lower conductivity, which in turn results in product loss and an increase in makeup water costs. Maintaining the optimal range of conductivity is important for system performance. Some of the possible causes for conductivity upset are blowdown valve and makeup valve malfunctioning.

If you have any questions or concerns, please contact Anthony Ridley (Nalco Account Manager) at (423) 322-9506 or Chris Rogers (Nalco Service Engineer) at (865) 389-6062.

All the test results, on the collected samples, were within the normal operating parameters. Based upon the test results, it appears the system is well protected from mineral scale formation, high corrosion rates and excessive microbiological growth. Limiting these system stress will increase the likelihood the system's efficiency will remain high.

Low Inhibitor Residual: Nalco's initial test results indicated the inhibitor residual (Nalco 3DT260) was below the recommended range for maximum protection against mineral scale formation and excessive corrosion. The normal operating range was established based upon the cooling tower's characteristics, the make-up water quality and potential for system stresses. Maintaining the proper inhibitor level helps ensure the potential for scale formation and high corrosion rate remains low. **Corrective Action:**

During routine maintenance, please check the following items to ensure proper maintenance of the chemical program.

- Check all chemical feed pumps to ensure they are powered properly and do not have leaks.
- Check your product inventory.
- Ensure surface blowdown valves are open.
- If you have any questions or concerns, please contact Anthony Ridley (Nalco Account Manager) at (423) 322-9506 or Chris Rogers (Nalco Service Engineer) at (865) 389-6062.

High Conductivity: The conductivity of the cooling tower's bulk water was above the normal operating range. The normal operating range was set to maximize the efficiency of the cooling tower by minimizing blowdown, while not allowing the dissolved solids, in the system, to exceed the capabilities of the scale/corrosion inhibitor. As illustrated by the results from today's water analysis, the high conductivity caused the total hardness and calcium hardness to exceed the capabilities of the scale and corrosion inhibitor. This increases the probability of mineral scale formation. **Cause:** The blowdown solenoid valve was unplugged from the Nalco 3D TRASAR controller. **Corrective Action:** The solenoid valve was plugged into the correct relay on the 3D TRASAR controller, which opened the valve. As high conductivity water is released from the system, it will make room for low conductivity make-up water. The addition of fresh make-up water will lower the over-all conductivity of the system.

Low Conductivity: The conductivity of the cooling tower's bulk water was below the normal operating range. Conductivity is a measure of the dissolved solids in the water. The recommended range is established to provide the optimal operation conditions for the cooling water system based upon the make-up water characteristics, mineral balance, system stresses and the selected chemical treatment program. Frequent blowdown or other forms of excessive water loss will cause lower conductivity, which in turn results in higher chemical loss and an increase in makeup water costs. Maintaining the optimal range of conductivity is important for system performance minimizing operating cost and limiting potential system stresses, such as high corrosion rates. **Cause:** The low conductivity is a result of cooler temperatures and

low system demand / load. Due to the low conductivity, the total and calcium hardness was below the recommended range, as well. **Corrective Action:** When the outside temperatures or system demand / load increases, so will the conductivity. The total and calcium hardness will increase, as the conductivity increases.

High Halogen Residual: The analytical analysis, on the cooling tower's bulk water sample, showed a halogen residual above the recommended range, for optimum microbiological control. The purpose of a cooling water bio-control program is to help our customers control the growth of micro-organisms (bacteria, algae, fungi and protozoa), in cooling water systems. These organisms can cause serious problems including loss of heat transfer efficiency, corrosion, flow restriction and public health issues. Having the proper amount of both Nalco 1338 and bleach will ensure the correct halogen level is maintained. However, too much halogen residual can be harmful to the system.

Although controlling microbiological activity is critical, too much halogen can adversely affect the system. High halogen levels can be aggressive to some metals (example: copper) and certain organic phosphates, such as HEDP, which are components of Nalco 3DT260 (scale and corrosion inhibitor). **Corrective Action:**

Boiler Water in Deaerator: Based upon the results from the analysis, on the water sample collected from the deaerator, there is strong evidence to support that boiler water has made its way into the deaerator. The conclusion was reached by evaluating the high hardness, high conductivity and high NexGuard residual, in the feedwater sample. There is no apparent cause to this issue. If this was an isolated incident, the condition should correct itself quickly. **Corrective Action:** Continue to closely monitor the quality of the feedwater. If condition continues, contact your Nalco Account Manager.

Low Conductivity: The water sample collected from cooling tower's recirculation line had a conductivity below the normal operating range. Conductivity is a measure of the amount of dissolved solids, in water. The recommended range is established to provide the optimal operating conditions for the cooling water system based upon the make-up water characteristics, mineral balance, system stresses and the selected chemical treatment program. Frequent blowdown or other forms of excessive water loss will cause lower conductivity, which in turn results in higher chemical loss and an increase in makeup water costs. Maintaining the optimal range of conductivity is important for system performance, minimizing operating cost and limiting potential system stresses, such as high corrosion rates. **Corrective Action:**

Document Metadata Report

Bates Beg	PLAINTIFFSR-000001809
File Name	Service report technical notes.doc
Author	aridley
Company Name	
Confidential	HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY
Date Created	9/3/2008
Date Last Saved	
Document Extension	doc
Document Folder Path	Ridley, Anthony\ [REDACTED] _1\ [REDACTED] _1.pst\Top of Personal Folders\Archive
File Type	Microsoft Word 2003/2004
MD5 Hash	552fb440460c7dafa0da918dab2625c8
Original File Extension	doc
Relativity Native Type	



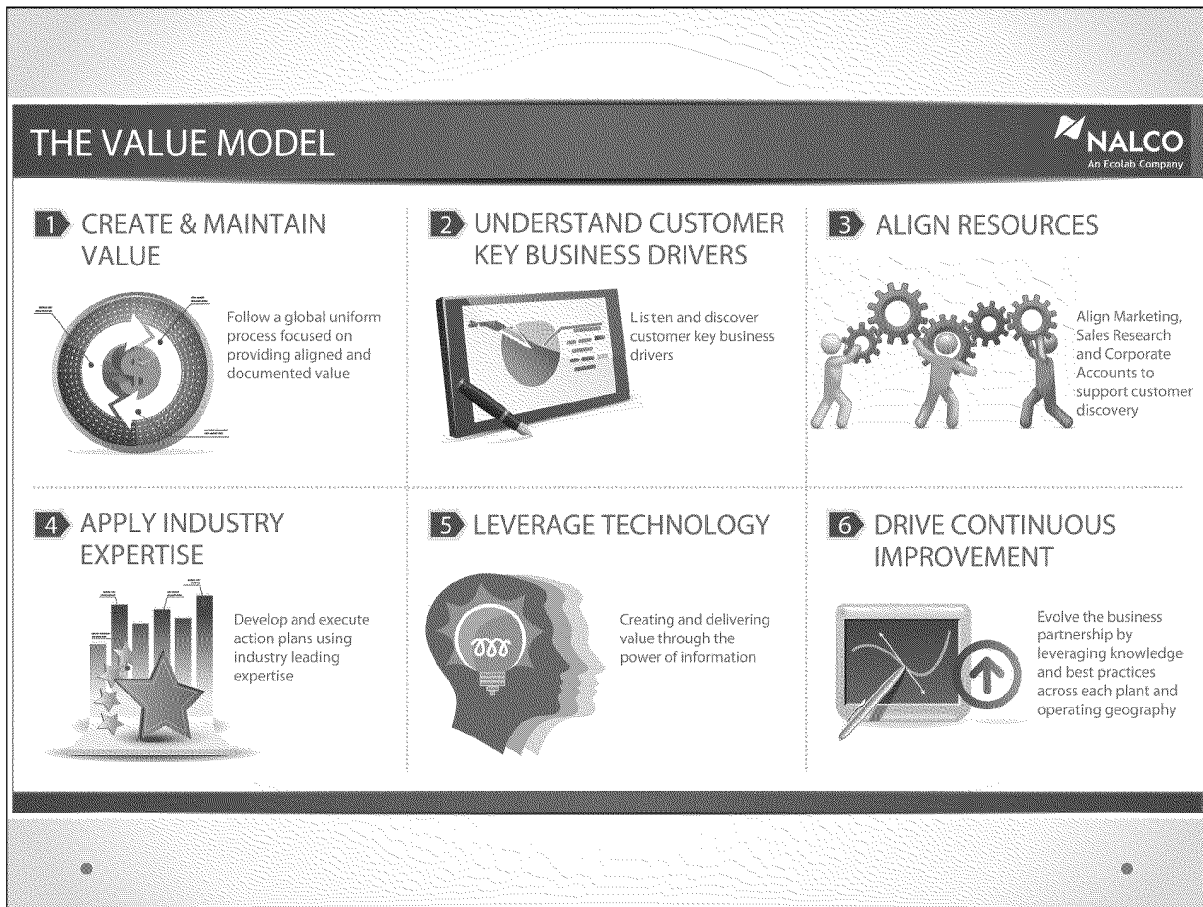
The native file does not exist for this document.

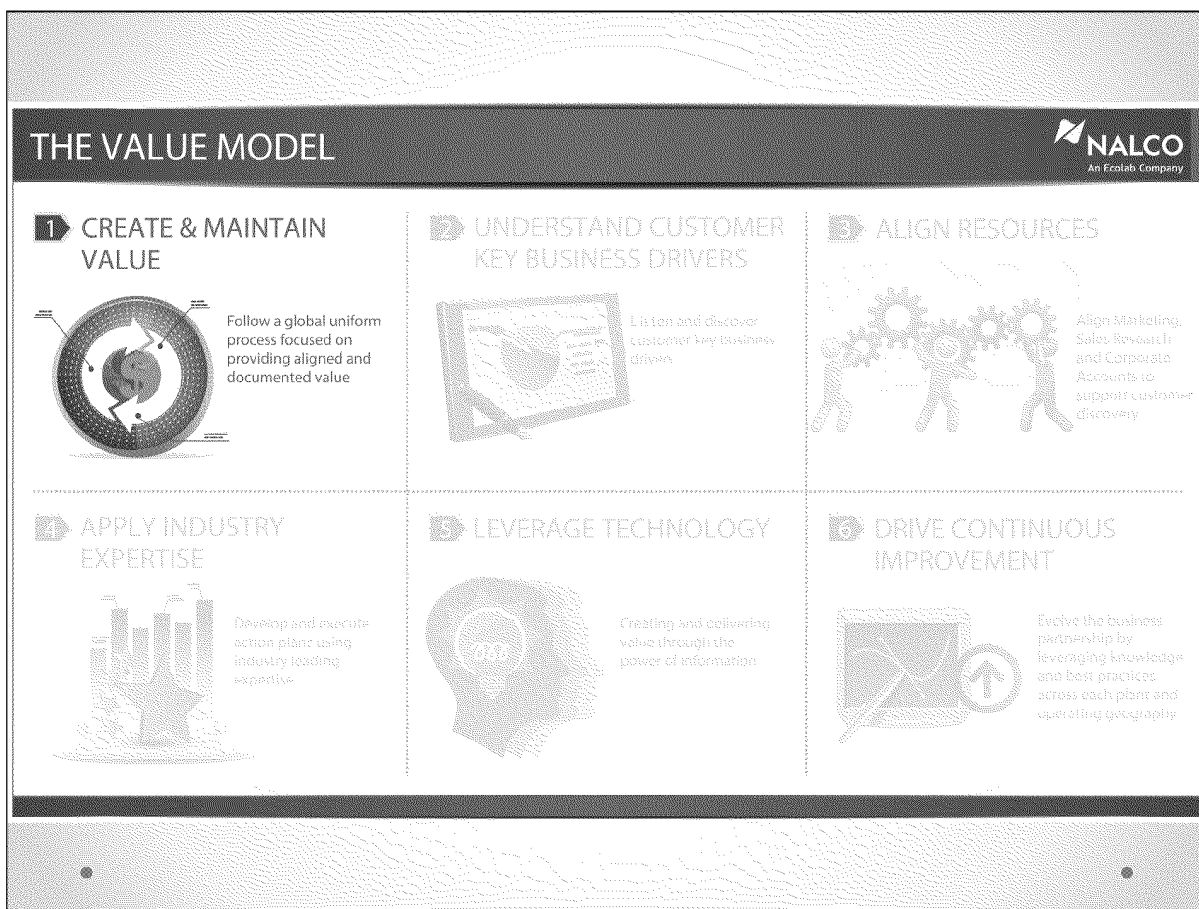


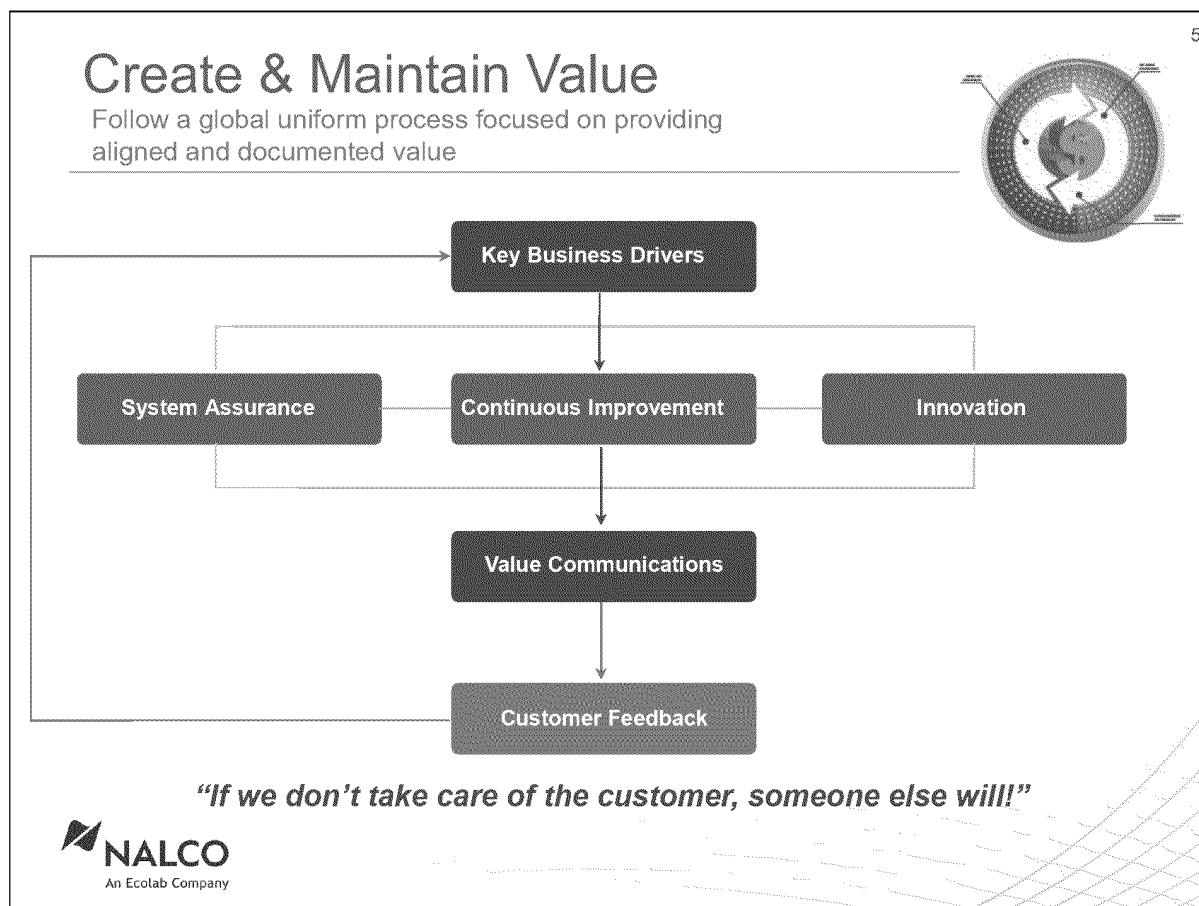
Why Are We Here Today?

- The purpose of this meeting is to discuss how Nalco is currently working with [REDACTED] facility, and how we will move forward together, in the future.
- Using Nalco's Create and Maintain Value Model (CMV) we will navigate each component to ensure expectations are managed.
- At the conclusion of this meeting, it is my hope that we have confirmed our established path to meeting [REDACTED] and continue growing our business partnership









At Nalco, we share this commitment to continuous improvement commitment at all levels of our organization. Nalco’s CMV—Create and Maintain Value — process serves as a road map to keep our service and support activities concentrated on your key business drivers. Everything we plan and everything we do fortifies or enhances the most critical elements of your business plans.

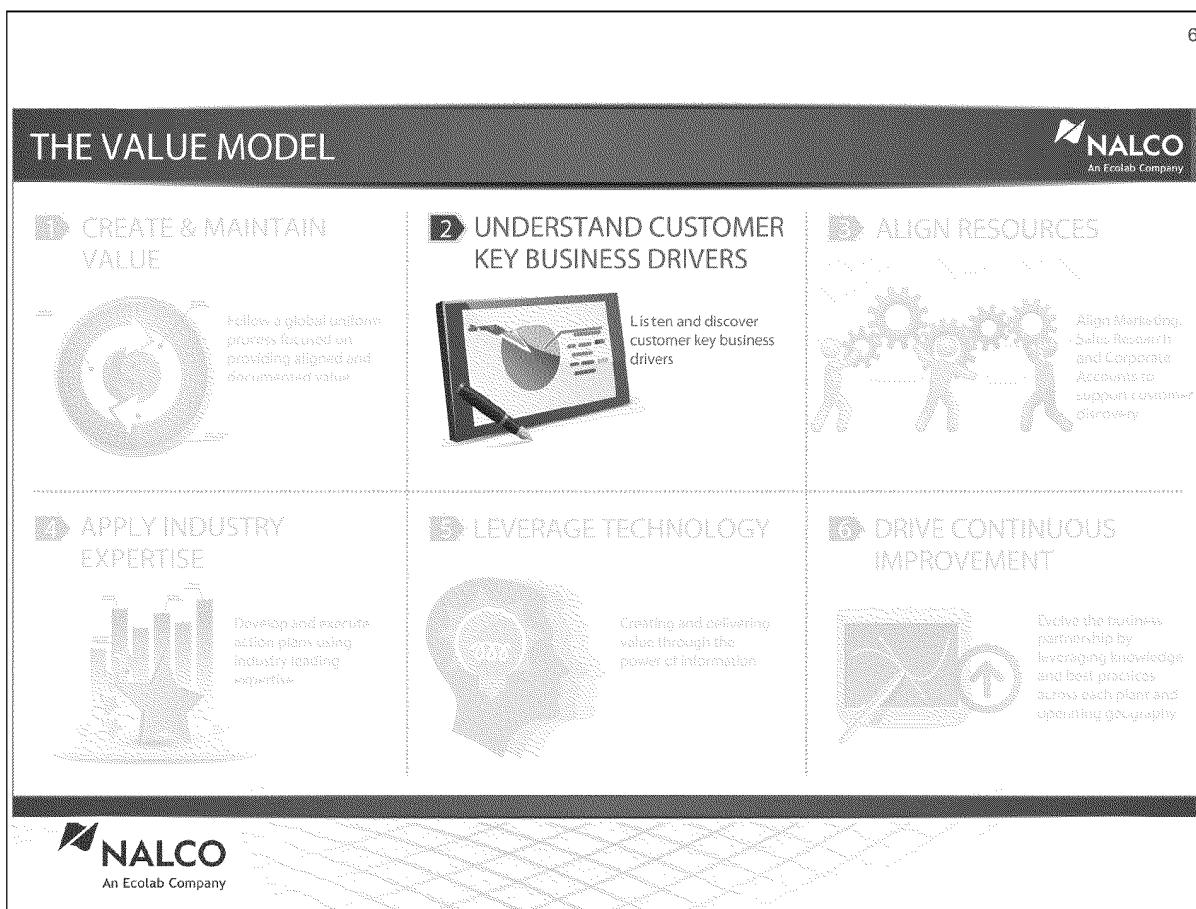
We maintain an equal focus on:

System Assurance - Asset protection and water treatment industry best practices

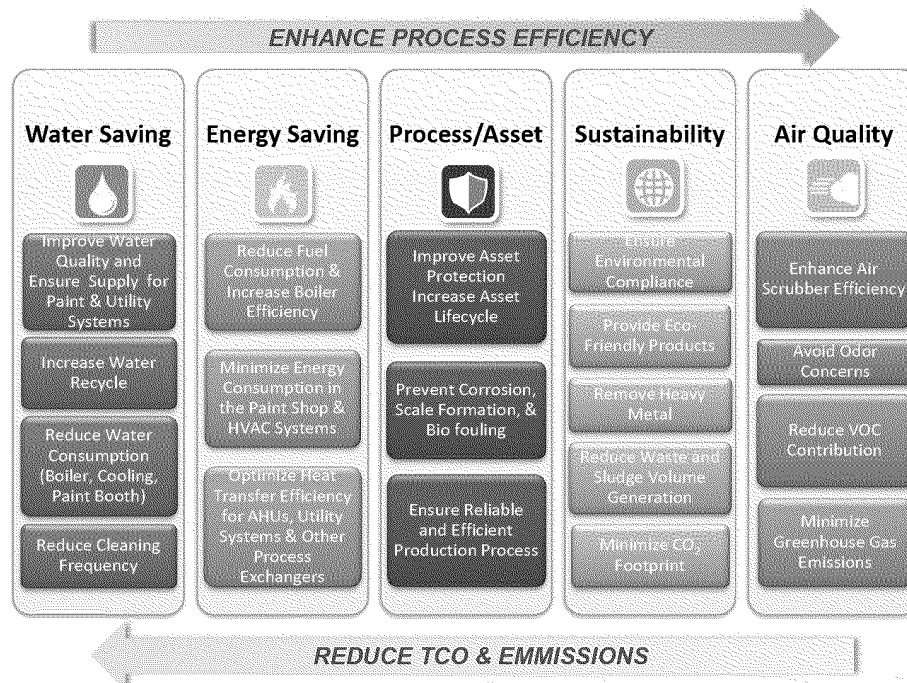
Continuous Improvement - Project management approach fueled by cost-saving ideas and based on proven practices

Innovation - The consistent introduction of new technology that delivers breakthrough advances

We support these activities by proactive and transparent communications to help ensure we achieve our goals and to gain your feedback on how we can challenge ourselves to be better... all the while grounding our decisions and action plans on the positive impact we can have on your KBD.



Nalco Creates Value for Automotive Customers



NALCO
An Ecolab Company

Automotive Industry Key Business Drivers

REDUCE WATER, WASTE, ENERGY, SUPPLIERS & COST

All Global OEMs have stated initiatives around core operating goals mostly focused in promoting a green image

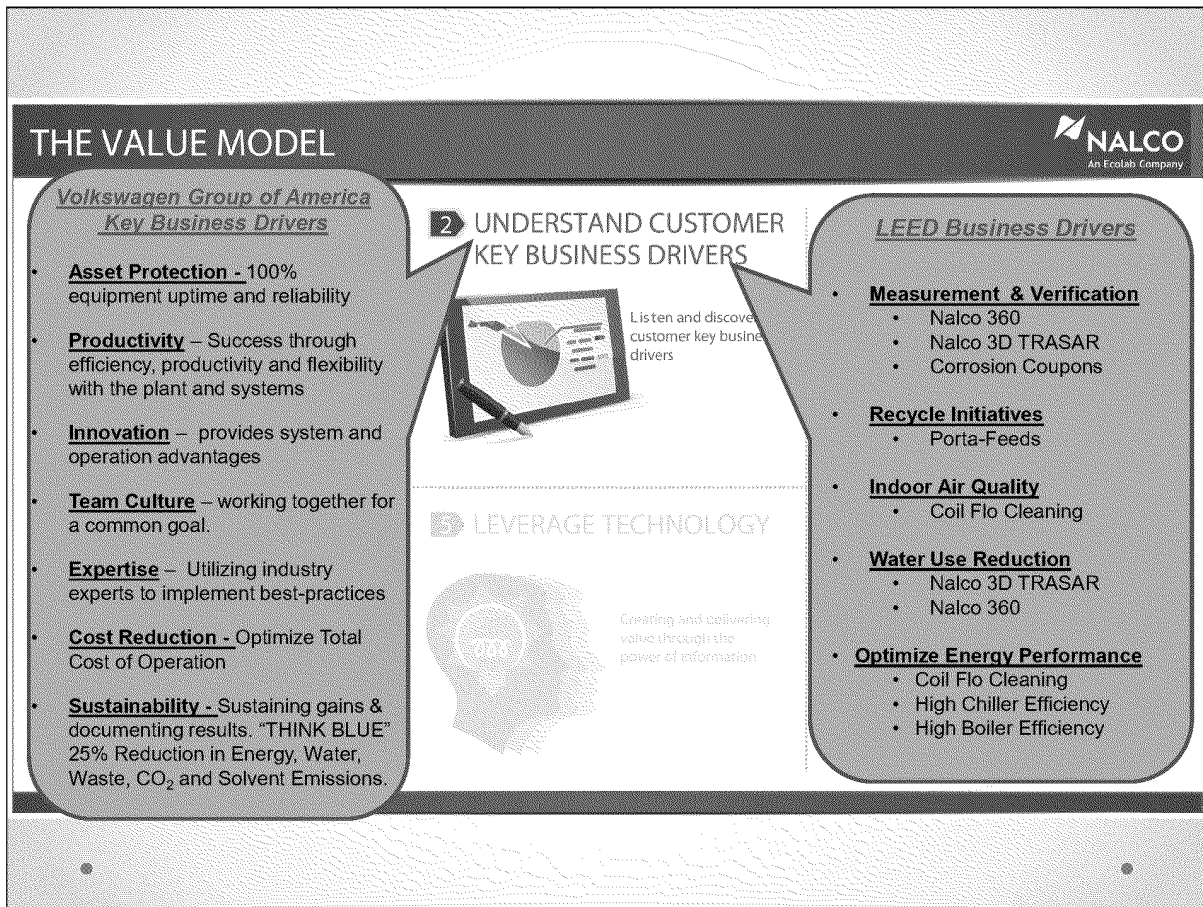
- Reduce Water
 - Water Per Job (kgal/unit)
 - Desire to move towards ZLD
- Reduce Waste - Landfill / Toxicity
- Reduce VOC
- Reduce, Reuse, Recycle

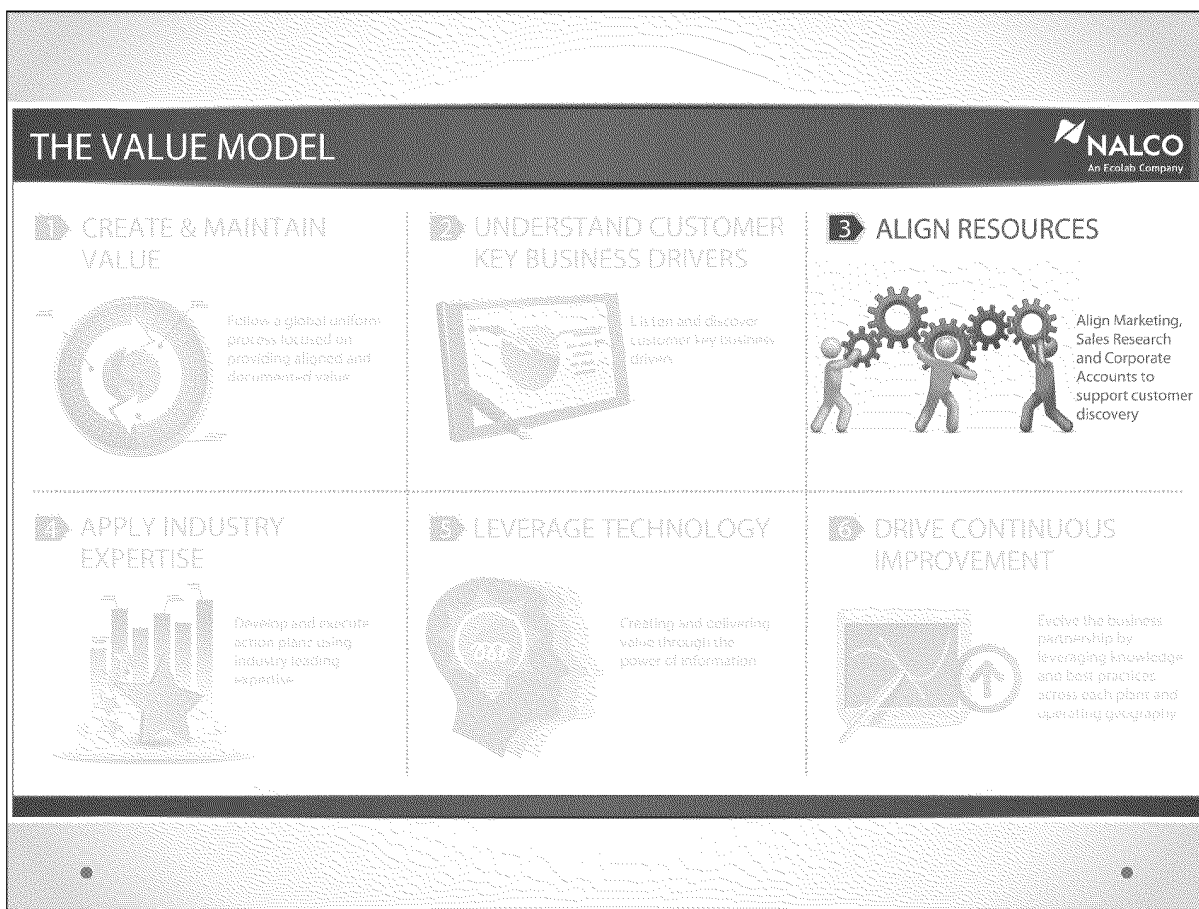
Manpower – Do More with Less

Heavy focus is placed on TCO Reduction

OEMs are car makers. They do not want to manage one-off activities.

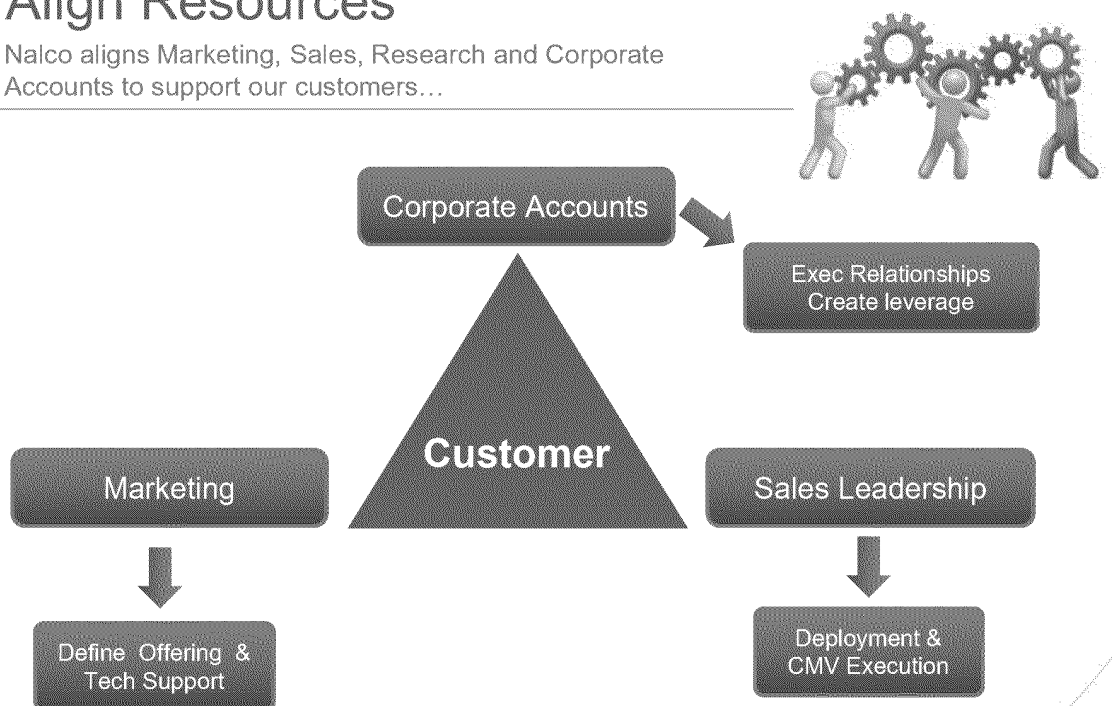






Align Resources

Nalco aligns Marketing, Sales, Research and Corporate Accounts to support our customers...



Be sure to discuss this slide as it relates to the customer from their point of view and relationships/goals with each point of contact.

Nalco's Team for [REDACTED]

Nalco Sales Team:

[REDACTED]

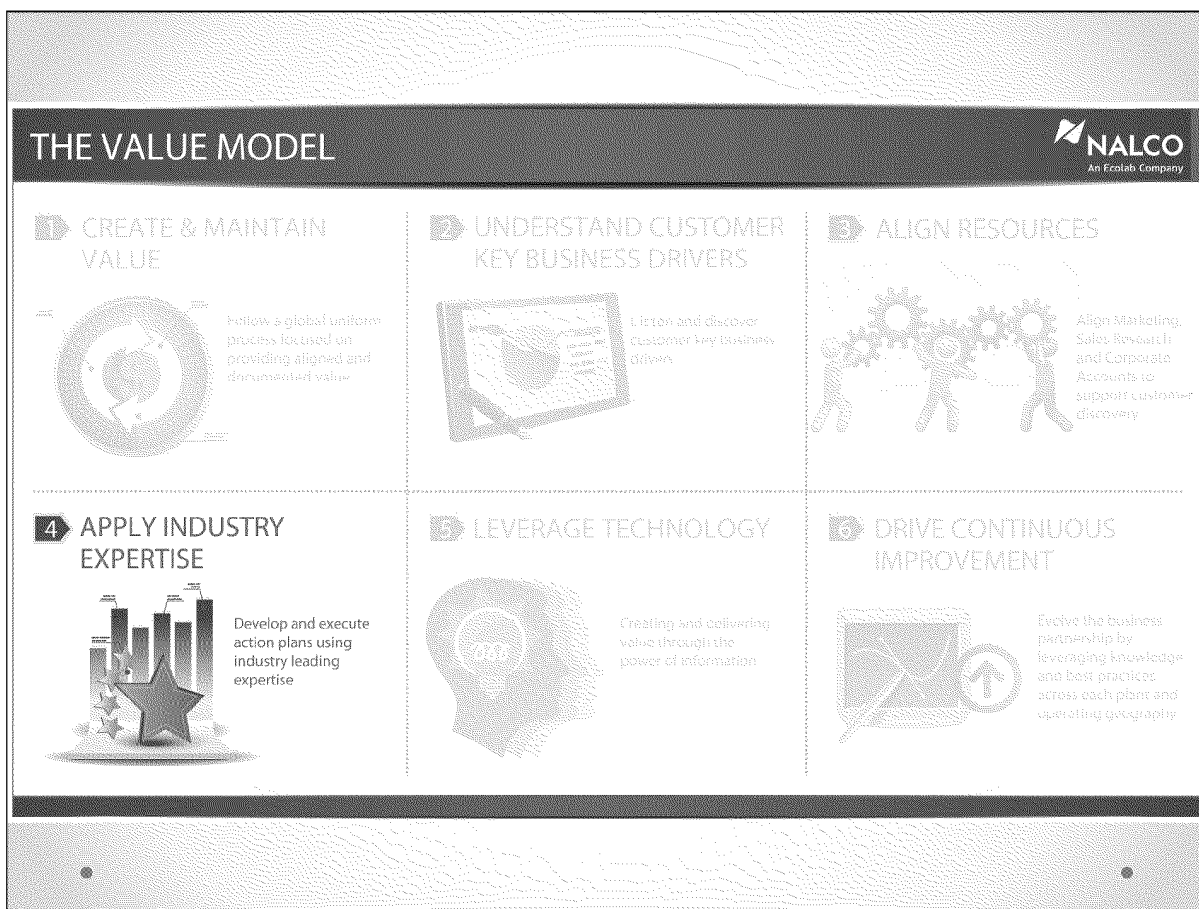
- Anthony Ridley – Senior Account Manager (Primary Contact)
 - 14 years of water treatment experience – 4 Years, in your facility

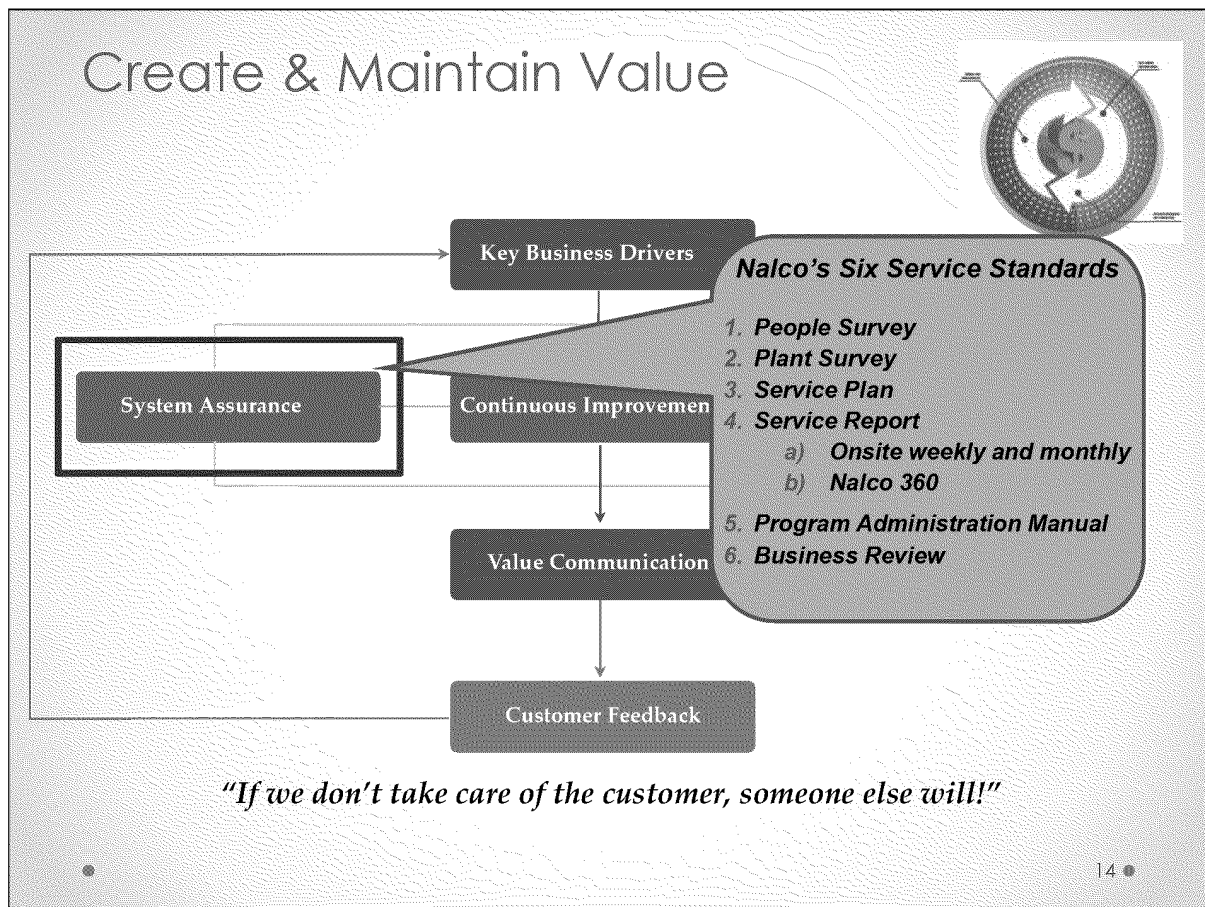
[REDACTED]

Nalco Manufacturing Corporate Team:

[REDACTED]







At Nalco, we share this commitment to continuous improvement commitment at all levels of our organization. Nalco's CMV—Create and Maintain Value — process serves as a road map to keep our service and support activities concentrated on your key business drivers. Everything we plan and everything we do fortifies or enhances the most critical elements of your business plans.

We maintain an equal focus on:

System Assurance - Asset protection and water treatment industry best practices

Continuous Improvement - Project management approach fueled by cost-saving ideas and based on proven practices

Innovation - The consistent introduction of new technology that delivers breakthrough advances

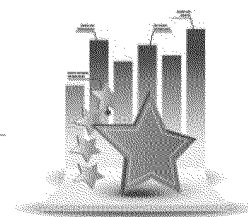
We support these activities by proactive and transparent communications to help ensure we achieve our goals and to gain your feedback on how we can challenge ourselves to be better... all the while grounding our decisions and action plans on the positive impact we can have on your KBD.

✓ Safety

Working to ensure the safety of our employees, contractors, customers and communities is vital to how we operate.

Leading indicators focus on behaviors and activities we are trying to encourage including:

- Performing risk assessments (identifying potential workplace hazards)
- Participating in safety training
- Reporting near-miss incidents, and
- Responding to the recommended improvements from our ECAP audits

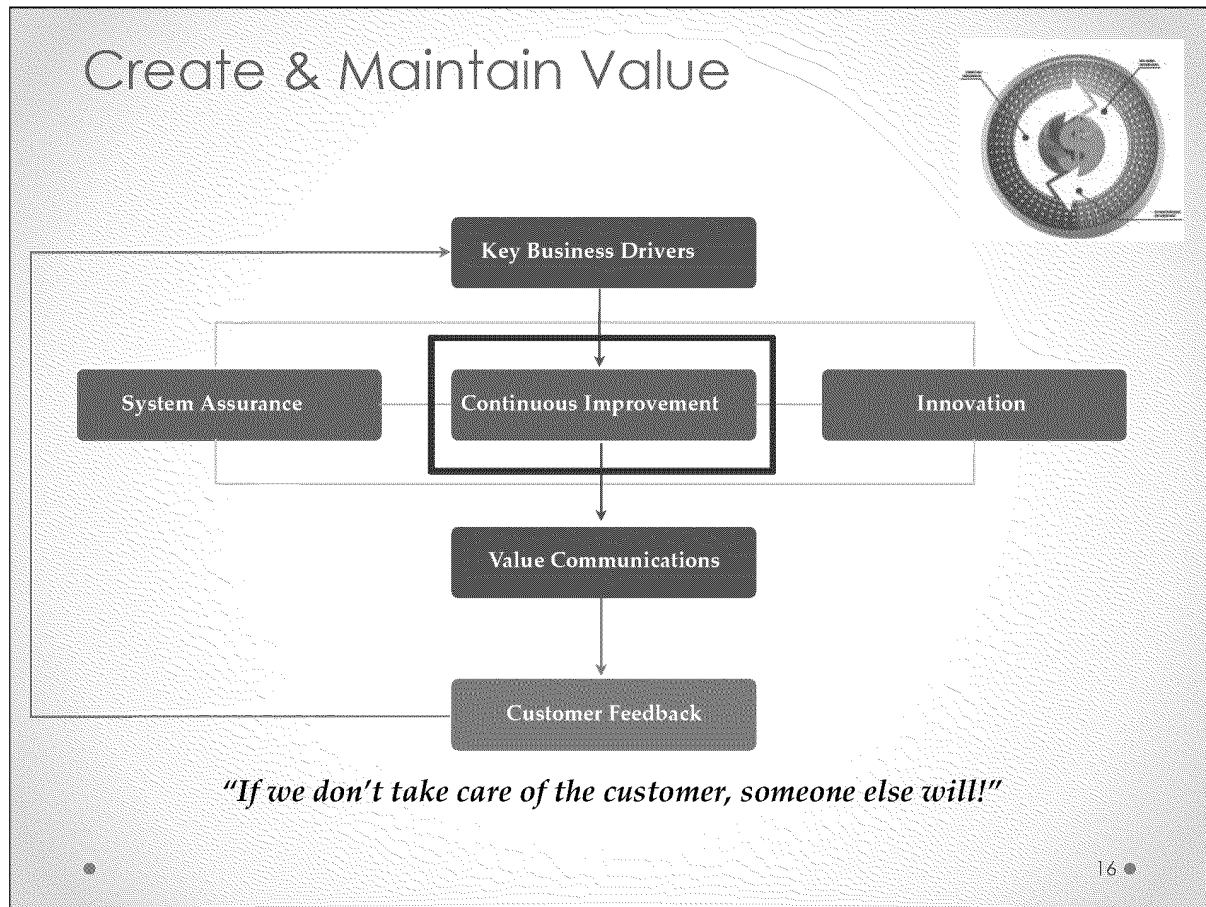


America's Safest Companies
Nalco was named one of America's Safest Companies by EHS Today magazine for providing a safe working environment for employees, achieving world-class safety status.

International Fleet **Safety Award 2011**

Fleet Safety Award
Nalco's European operations won the 2011 International Fleet Safety Award from Fleet Europe magazine for implementing a fleet safety program focused on original tools and programs to improve driver safety while also optimizing Total Cost of Operations



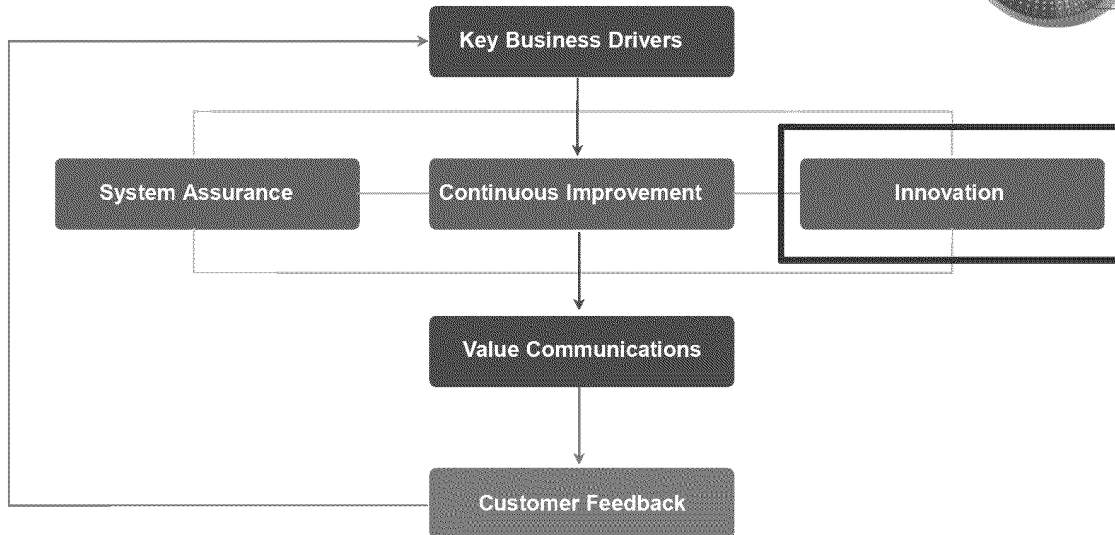
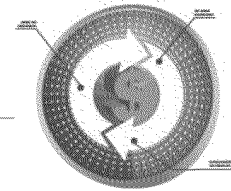


Nalco's Proposed Goals & Continuous Improvements...



Create & Maintain Value

Follow a global uniform process focused on providing aligned and documented value

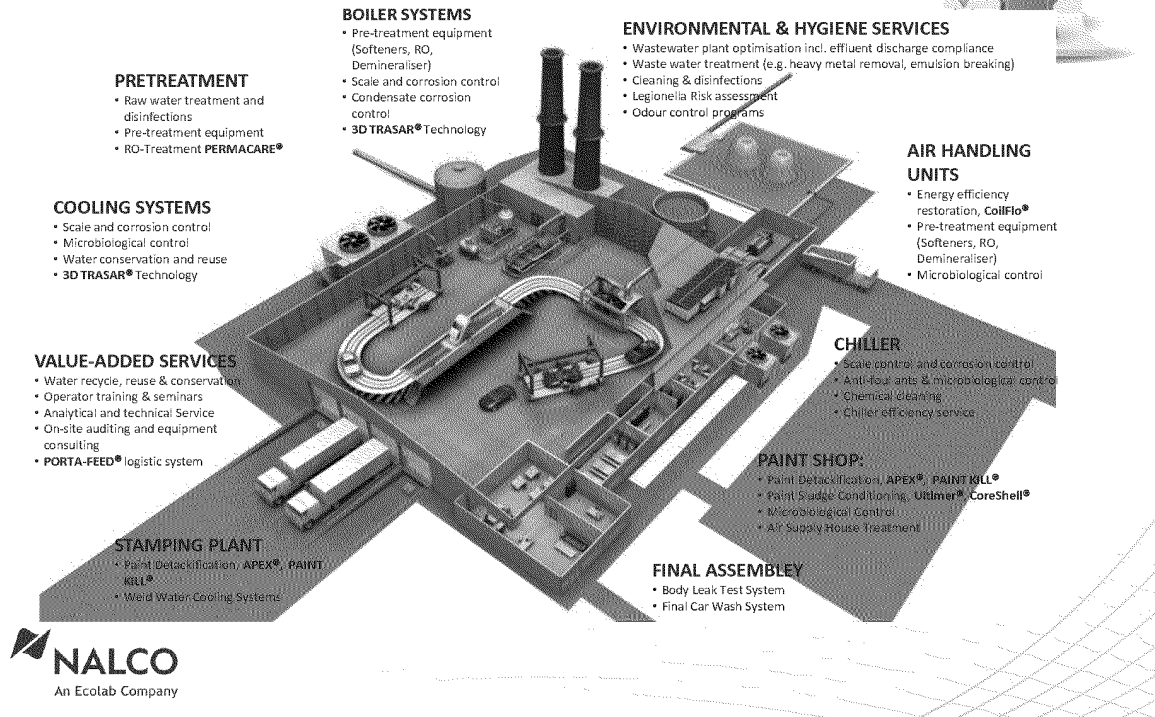


"If we don't take care of the customer, someone else will!"



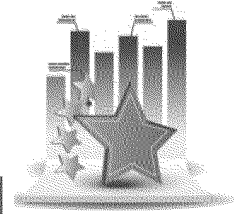
✓ Key Automotive Assembly Plant Solutions





Nalco Capabilities & Offerings for Automotive Plants



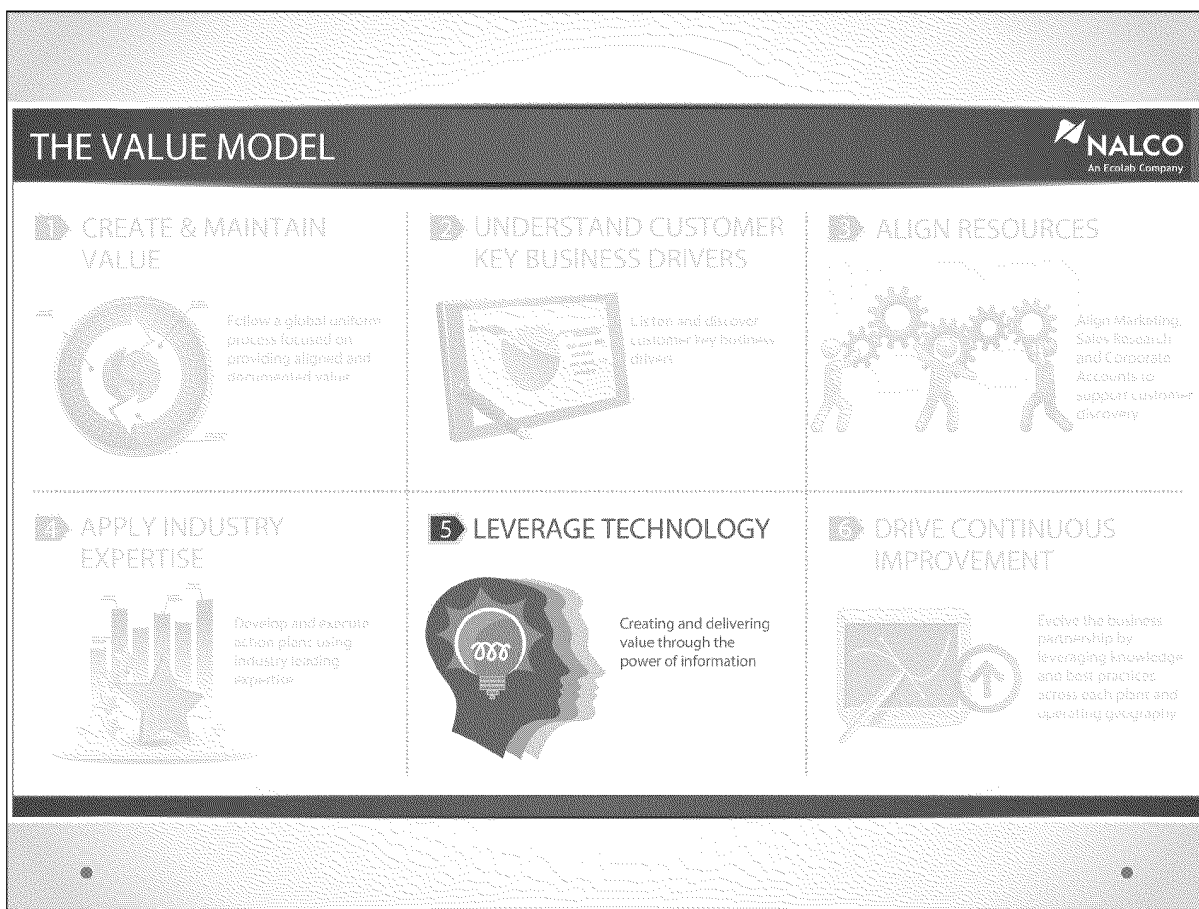
✓ Proven Sustainability Leader

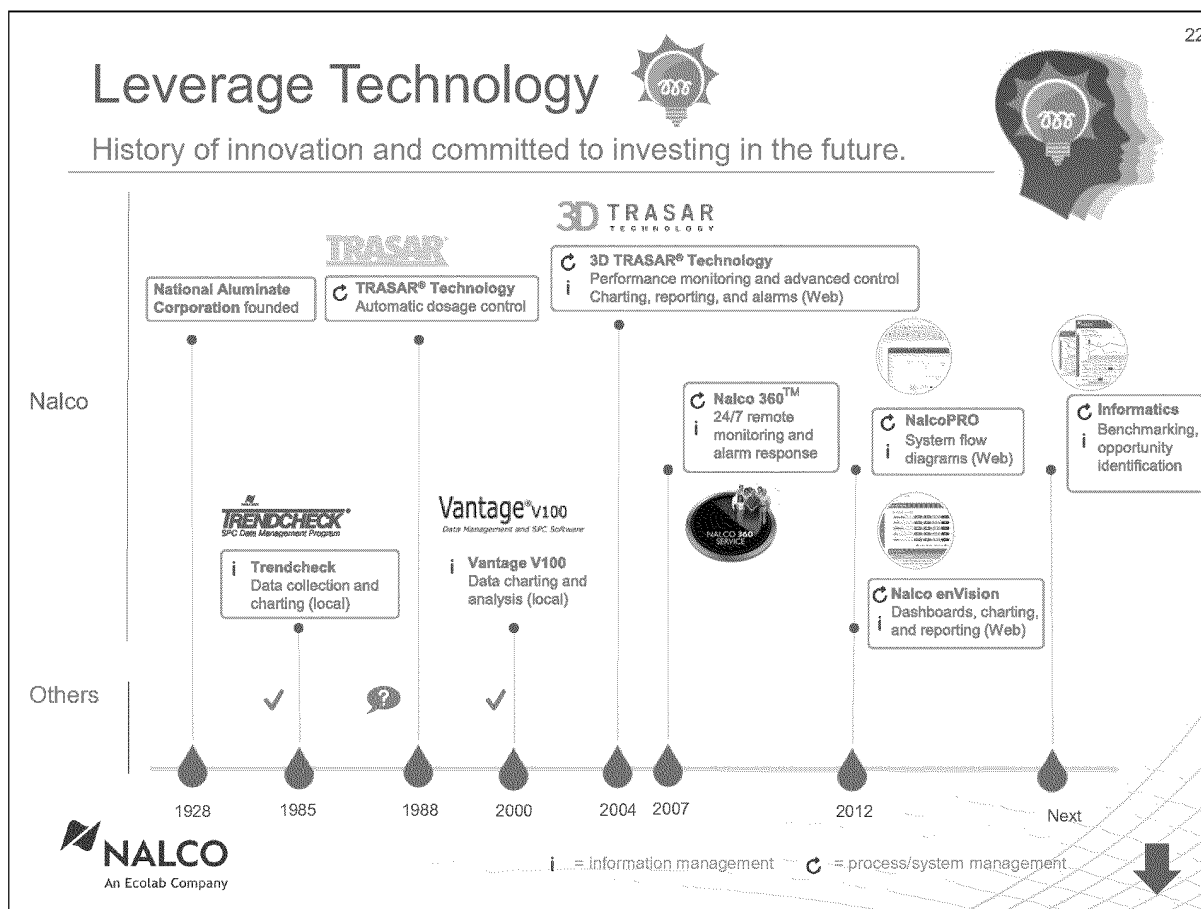
Gaining External Recognition for Our Sustainability Efforts



Survey/Ranking	2012	2011	2010	2009	2008	2007
CARBON DISCLOSURE PROJECT Investor Maximum Score = 100 - Higher Score Better	93 S&P 500 Disclosure Leadership Index	91 S&P 500 Disclosure & Performance Leadership Indices	84 S&P 500 Disclosure Leadership Index	59	56	32
 Dow Jones Sustainability Indexes Member 2012/13 Leading sustainability-driven companies worldwide	DJSI World Index and DJSI North America Index	DJSI World Index and DJSI North America Index*	DJSI World Index*	DJSI World Index*	n/a	n/a
 maplecroft Risk, transparency and reputation Climate Innovation Index (CII) Lower Ranking Better	43 CII Leader	39 CII Leader	72 CII Leader	n/a	n/a	n/a
 FTSE4Good Socially Responsible Investment Index	Listed	-	-	-	-	-
 FORTUNE 500 Lower Ranking Bigger Company	365	378	365	403	438	457







From our company's beginnings, we have maintained certain constants in our mission to be the industry leader in the industries we serve. This means we:

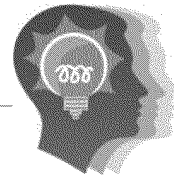
Stay focused on what will make our customers successful

Develop our people and our technology to be the very best as measured by our customers' satisfaction

We have long believed that the expectations of our most demanding customers, combined with our obsession to be the very best, represent the most powerful stimulus to our innovation and to secure Nalco's leadership position in technology-driven solutions across the globe.

3D TRASAR® Technology

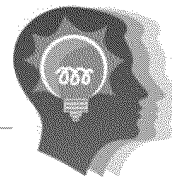
Over 20,000 systems that have improved performance, greater reliability, lower operating cost



As a cornerstone, proprietary platform, Nalco's 3D TRASAR® Technology integrates state-of-the art components, data management, and telemetry to provide real-time and predictive knowledge of your most critical water applications.

Key Industry Technologies

Nalco Capabilities & Offerings for Automotive Assembly Plants

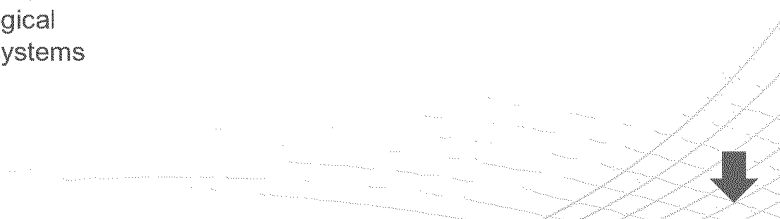


Sustainability. Water Savings. Energy Reduction. Waste Treatment.

3D TRASAR® Cooling Water Technology

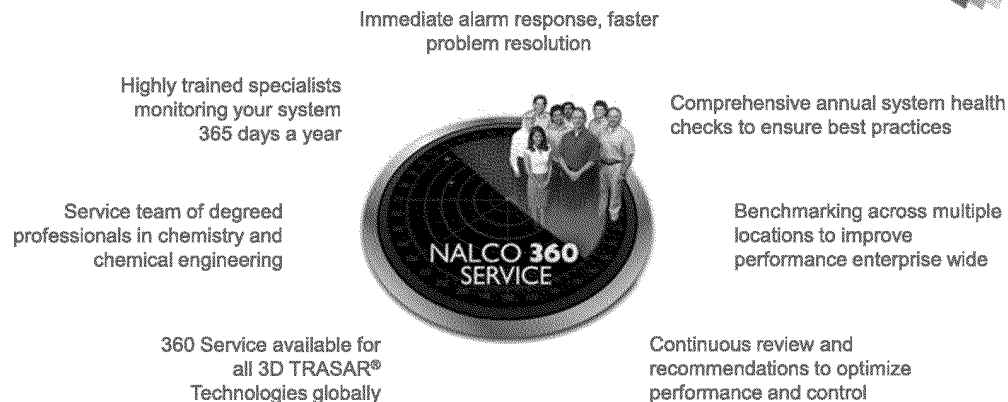
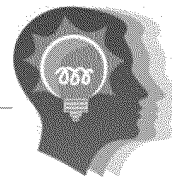
Patented Actives Based Control

3D TRASAR Technology for cooling water utilizes unique real-time monitoring, patented actives-based control technology, proprietary stress resistant chemistry and 24/7 information management capabilities to detect, determine and deliver improved scale, corrosion and microbiological performance in cooling systems



Nalco 360 Service

Monitoring and ensuring system reliability 24/7



Ensuring total peace of mind day in and day out

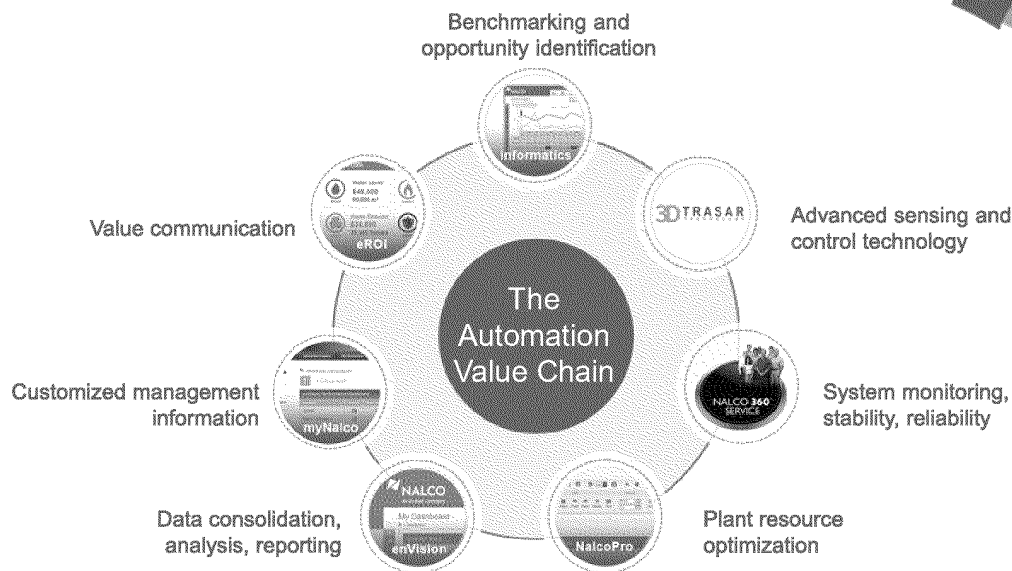
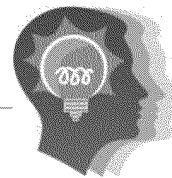


Nalco's 360 Service network translates data and system information into an educated, prioritized set of actions. At all times, under all conditions, Nalco's team of trained technical experts monitors your systems and stands ready to intervene BEFORE a concern becomes a problem.

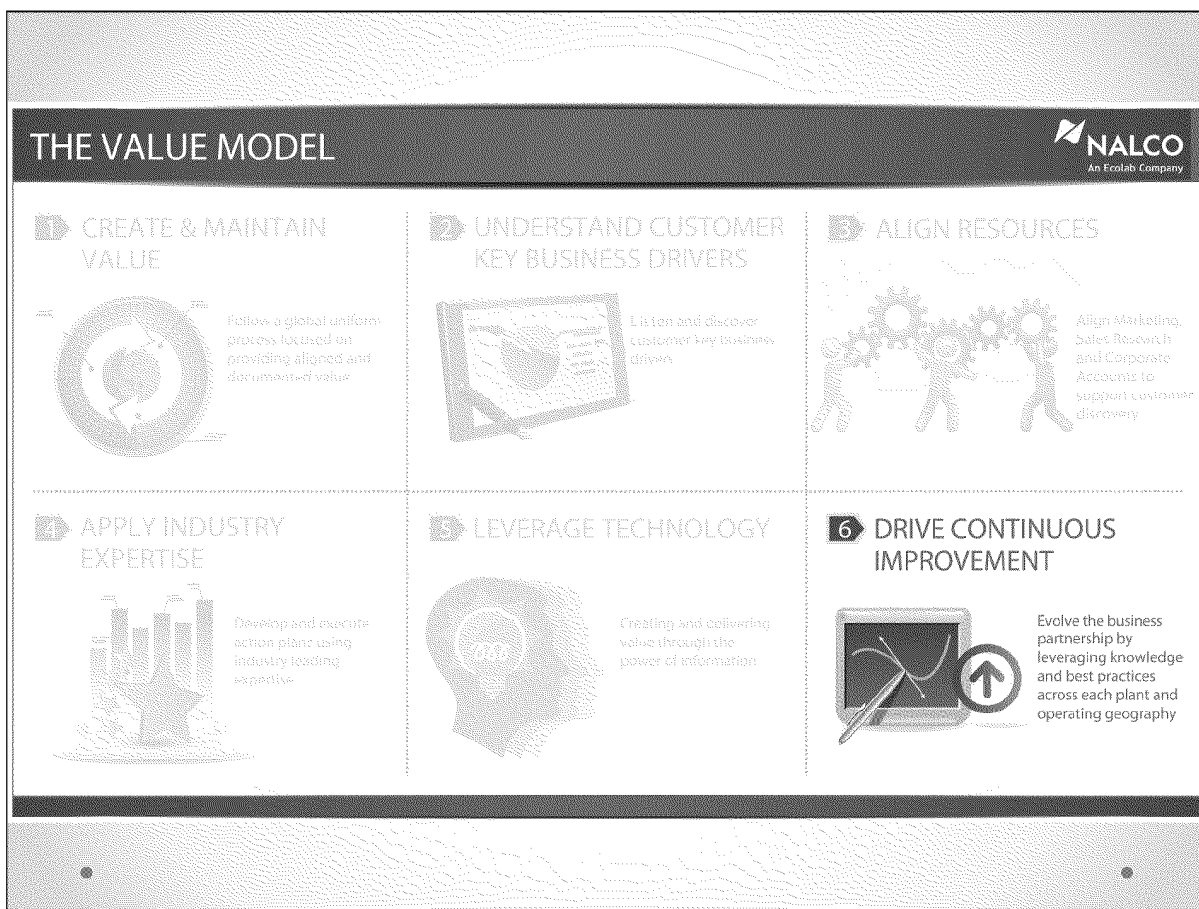
Today, this system of active prevention provides peace of mind for our customers across the globe. As Nalco expands the 3D TRASAR network deeper into our customers' process applications, we will pair Nalco 360 Service with each new application to assure 24/7 security and support — demonstrating our uncompromising commitment to partnering with and creating value for our customers at every opportunity.

The Nalco Automation Value Chain

Meeting your challenges with best-in-class automation

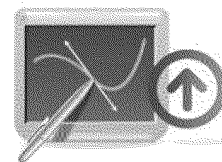


For our customers today, innovation must include continuous advancement in automation and data management. While a single tool in a single application can create localized value, Nalco recognizes that an integrated system linking critical data can reproduce and multiply this value over time and across your entire enterprise. We customize the Automation Value Chain to focus on the value creating actions and information that you prioritize. Let's look at each of these elements and how they deliver value ...



Nalco enVision

Single-source, Web-based data and system management platform



Comprehensive Nalco information on demand

Customized KPI dashboards

Consolidated views enterprise-wide



Tank level automation to optimize inventory and spend management

At-a-glance performance and inventory status

Notifications, alarms, reports, order status, and more

Intuitive interface enables informed decision making



Actionable performance data across your organization

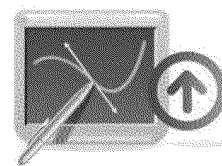
Without a doubt, data can help create great value. Often, however, the magnitude of that value depends on having important data at your fingertips at the moment you need it and in a form you can use it.

We built Nalco enVision — our integrated data and communications platform — for just that purpose: to meet our customers' needs for the information that their critical data represents.

Imagine ... valuable system information from anywhere across the world available 24/7. Imagine ... the added value of summary data across your enterprise directing you to KPIs that identify best practice examples or to areas needing immediate attention. Imagine ... a data format that actually TELLS you where you can have the most impact!

MyNalco.com

Your window to the world of Nalco performance data and management resources



Your point of entry to complete information

Single-source product and safety information

Easy access to the Nalco information you need

Online training resources

Access to customized dashboards for monitoring and optimizing performance

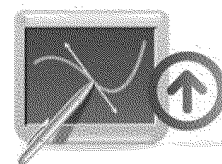
Communications central for service and support

Customized, one-point access to complete information enterprise wide



Informatics

Turning performance data into actionable insight

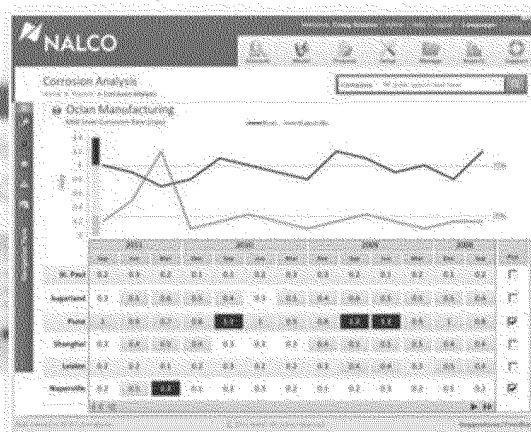


Adding a new dimension to automation and management decision making

Defining the future of water and energy optimization

Benchmarking water and energy use, operations cost, environmental impact, and more

Benchmarking against internal sites/systems, Nalco best practices, and industry best-in-class performance



Charting a clear path for continuous performance improvement

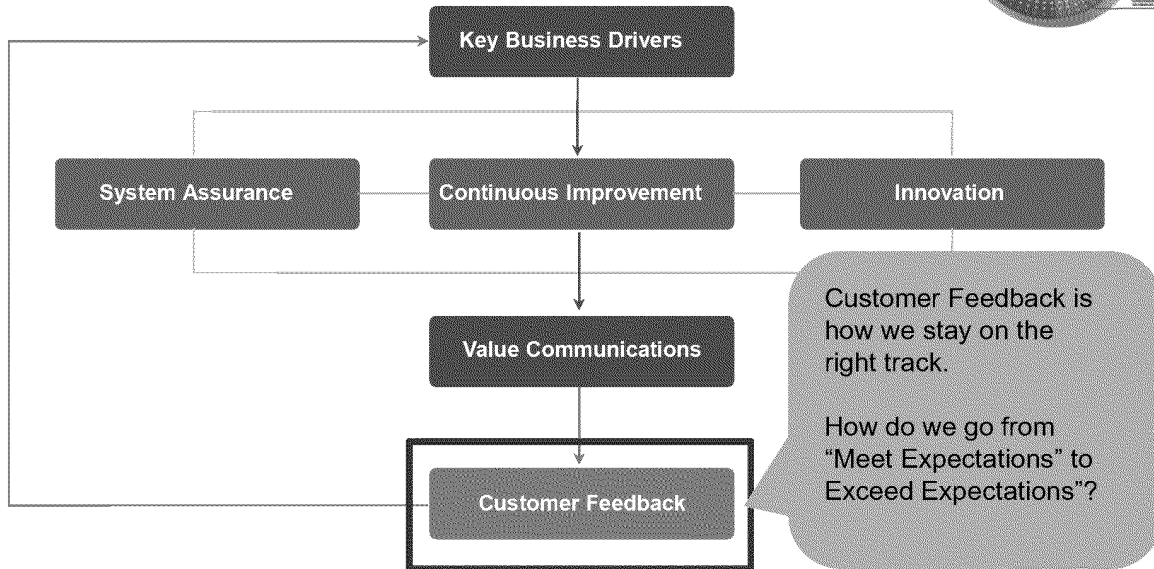
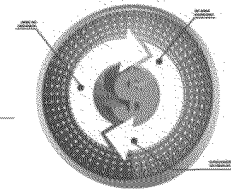


Leveraging the power of information to move your business forward

We have also set as a priority the development of reliable, comprehensive, industry-based benchmarking data. Nalco's unique position across all major industries and in all regions of the world has allowed us to aggregate valuable data that we can use as context for best practice comparisons. At the same time, we offer our customers total assurance that their proprietary data always remain completely secure and can never be shared outside their organizations.

Create & Maintain Value

Follow a global uniform process focused on providing aligned and documented value



"If we don't take care of the customer, someone else will!"



Customer Feedback....



Document Metadata Report

Bates Beg	PLAINTIFFSR-000001814
File Name	██████████ ABR 2013.pptx
Author	Jessica Stines
Company Name	
Confidential	HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY
Date Created	1/24/2013
Date Last Saved	
Document Extension	pptx
Document Folder Path	Ecolab\2023.03.02 Delivery\██████████ abr 2013_1\██████████ abr 2013_1.pst\Top of Personal Folders\Archive
File Type	Microsoft PowerPoint 2010/2011
MD5 Hash	1afdf891aa51435c05d006f6f5ef5b4b
Original File Extension	pptx
Relativity Native Type	



The native file does not exist for this document.



NALCO Water
1601 W. DIEHL ROAD
NAPERVILLE, IL 60563-1198

Nalco Company LLC

Address

Email: Email

Customer Full Name

Customer Title

Company Name

Address

[CreateDate \@ "MMMM d, yyyy"]

Dear Customer First Name,

We at Nalco Company are thrilled to have the chance to submit a proposal that will help your company lower its operational costs. In the accompanying proposal, we have outlined how the Company Name can move from "maintaining" your water treatment systems to optimizing your water treatment systems. Our advanced approach maintains your systems to prevent unexpected shutdowns, reduce unnecessary expenses, and reduce production downtime. We will also employ technology and practices that would go farther to increase efficiency and save energy costs.

After a thorough survey and analysis of your operation, we found that there are easy opportunities for improvement:

- Clean and maintain vital heat transfer surfaces
- Reduce breakdown of vital production systems
- Use advanced technology to monitor system performance
- Streamline your operator time to maintaining your systems
- Increase ROI over time

By using our comprehensive approach, Company name can reduce energy costs by almost [REDACTED] and develop a water treatment program that will meet all your requirements and take advantage of saving opportunities.

The enclosed proposal includes in depth information on how we have helped other companies achieve these goals. Please call us at Rep Phone if you have any questions or doubts. We are sure that we have the program that meets the requirements of your company.

Sincerely,

Rep Name

Rep Title

BUSINESS PROPOSAL

[CREATEDATE \@ "MMMM d, yyyy"]

Terms valid for 60 days from date issued**Water Treatment Program****Prepared for**

Company Name
Address

Herein referred to as "Customer"**Prepared by**

NALCO Water, An Ecolab Company
1601 W. Diehl Road
Naperville, IL 60563

Herein referred to as "Nalco"

INFORMATION CONTAINED IN THIS
DOCUMENT IS CONFIDENTIAL AND
INTENDED ONLY FOR USE BY THE PARTY
NAMED HEREIN AND NALCO, AN ECOLAB
COMPANY

Executive Summary

Click and type proposal executive summary

Problem Statement

The expectation of Company Name is that Click and insert the customer's expectations of the water treatment program(s). In the event that your systems change without notification you are also looking for an effective and economical process to respond without disrupting operations, significantly increasing treatment costs, and causing equipment failure.

Unfortunately, your treatment program hasn't consistently provided the water quality necessary to achieve the goals you've expected.

Proposed Solution

We propose the following improvements to help you achieve the goals that you have for your water treatment operations:

Click and insert the NALCO proposed solution to solve the customer's problem or realize the customer's goals

Scope of Work

Proposed Products

Category	Sub-Category	Description
----------	--------------	-------------

Proposed Services

Name	Description
------	-------------

Recommended Equipment

Equipment Name	Description

Nalco Responsibilities

Task	Description
------	-------------

Customer Responsibilities

Task	Description
------	-------------

Proposed Budget

Item	Cost
Cooling Water Program	
Boiler Water Program	
Waste Water Program	
Equipment	
Services	
Miscellaneous	

Notes:

Click and type any clarifying buget notes or details

<div> Total Annual Investment: \$\$\$\$\$\$ <i>** does not include tax **</i> </div>
--

Nalco makes no warranties or guarantees with respect to water system biohazards from waterborne pathogens including but not limited to Legionella bacteria. Nalco does not and cannot make any guarantee or warranty that the risk of the presence of Legionella or the risk of legionellosis has been reduced or eliminated by reason of the Program. Nalco accepts no liability for any penalties or fines assessed by the City of New York, the State of New York or any other government or agency.

Terms and Conditions of Sale

1. **GENERAL:** Nalco shall be responsible for reasonable diligence and care in providing its services and products, and Customer shall be reasonably diligent in following Nalco instructions related to such products and services. Nalco shall not be liable for any failure caused by Customer's failure to follow Nalco's instructions.

2. **PAYMENT TERMS:** Standard payment terms are net 30 days of invoice date. Past due invoices are subject to a late fee of [REDACTED] per month. Prices exclude any applicable sales, use, excise, VAT, export and import taxes, and similar fees. Unless otherwise agreed, product shall be shipped F.O.B. Nalco's facility, and risk of loss shall pass to Customer upon Nalco's tender of the product or equipment.

3. **NALCO EQUIPMENT:** For Nalco-owned Equipment and PORTA-FEED® units ("Equipment") furnished to Customer on a rental or use basis, the following applies:

- a) Equipment shall remain the sole personal property of Nalco even though attached to realty. Nalco may mark Equipment to indicate its ownership, and file a financing statement covering such Equipment. Customer shall provide a suitable location and utilities for the Equipment, and is responsible for applicable personal property or use taxes.
- b) Customer shall not use the Equipment with any materials or products other than those recommended or approved by Nalco. Customer shall operate the Equipment in accordance with Nalco's recommendations. Nalco shall have the right to inspect and service Equipment during normal business hours. Customer assumes all risk of loss, damage or liability arising from its possession or use of Equipment, and shall indemnify Nalco from all such losses, damages or liabilities.
- c) Empty PORTA-FEED units shall be promptly returned to Nalco. Upon termination of this agreement, Customer at its expense shall return all Equipment to Nalco in the same condition as received, ordinary wear and tear excepted.
- d) Any software and documentation provided by Nalco remains the sole and exclusive property of Nalco, and shall be used only for purposes authorized by Nalco.

4. **FORCE MAJEURE AND SHORTAGES:** Neither party shall be liable for any failure or delay in performance (other than payment), which is due, in whole or in part, to any cause of any nature beyond the reasonable control of the party affected. If there are product shortages for any reason, Nalco may allocate the available supply of product on whatever basis it deems practical.

5. **WARRANTIES:** Nalco warrants that (a) its chemical products shall conform to Nalco's standard product specifications in effect at the time of shipment, (b) its services shall be performed in a good and workmanlike manner, (c) its equipment shall be free from material defects in workmanship and materials for a period of 12 months from the date of shipment, and (d) its products and equipment shall be transferred with good title free of liens. Nalco's liability under this warranty is limited to replacement of nonconforming product, repair or replacement of defective items, or, a refund of or invoice credit for the product price. The water treatment program does not cover, and Nalco makes no warranties with respect to, water system biohazards from waterborne pathogens, including but not limited to Legionella bacteria. Nalco **DISCLAIMS ALL OTHER WARRANTIES INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.** In no event shall either party be liable to the other for any consequential, indirect, special or exemplary damages, including but not limited to lost profit and lost production.

6. **CONFIDENTIALITY:** Customer shall not: (a) disclose to a third party any nonpublic information, composition, design, operation or application of Nalco products and equipment ("Proprietary Information") without the prior written consent of Nalco; or (b) use the Proprietary Information for any purpose not authorized by Nalco. Customer shall not be liable for disclosure of information that: (a) is or becomes part of the public domain through no fault of Customer; (b) is disclosed to Customer by a third party having the right to make such disclosure; or (c) is in the possession of Customer at the time of disclosure by Nalco.

7. **COMPLIANCE WITH LAWS:** Customer shall not resell product without Nalco's prior consent, and shall not resell, divert, transship, export or re-export the product to any country, except in accordance with applicable national and state laws and regulations. Customer is responsible for compliance with all environmental, health and safety regulations regarding its facility, operations, and equipment, including any registrations applicable to use of storage tanks at its facilities.

8. **TERMINATION:** Either party may terminate this agreement if (a) the other party fails to perform a material obligation and (b) such default is not cured within 45 days after written notice of the failure. If Customer fails to make a payment when due or Customer's financial condition becomes unsatisfactory to Nalco, then Nalco, at its option, may (a) withhold future performance until Customer cures the default or improves its financial condition to Nalco's satisfaction; (b) require payment in advance; or (c) terminate this agreement.

9. **INSURANCE:** Nalco agrees that during the term of this agreement it will maintain the following policies of insurance:

[REDACTED]

Customer shall be named as Additional Insured, with respect to liability arising out of Nalco's negligence/indemnification obligations under this agreement, under Nalco's Commercial General Liability coverage. A Certificate of Insurance will be provided as evidence of insurance coverage.

10. MISCELLANEOUS:

- 1) This agreement shall be governed by the laws of Illinois without regard to conflict of law principles. The United Nations Convention on Contracts for the International Sale of Goods is inapplicable to this agreement.
- 2) With respect to matters related to this agreement, each party as indemnitor agrees to hold the other party harmless from damages, claims, liabilities and costs caused by the negligence or misconduct of the indemnitor.
- 3) Nalco may use a subcontractor provided that the subcontractor is acceptable to the Customer.

11. **CONSIGNMENT PRODUCT:** For Nalco-owned chemical product provided on a consignment basis, the following applies:

- 1) Customer shall provide an appropriate storage vessel or location for the Consigned Product and shall mark such to show Nalco's ownership. After delivery to and receipt by Customer of Consigned Product, Customer shall be responsible for loss of or damage to any Consigned Product unless caused by Nalco's negligence or misconduct. Title to the Consigned Product shall pass to Customer upon (i) removal from a storage vessel, or (ii) opening of a portable or tote container.
- 2) Nalco shall have the right to inspect the Consigned Product, and to file a financing statement securing its interest therein.
- 3) Upon termination of the consignment arrangement, Customer shall purchase all remaining Consigned Product at the then current price unless the Consigned Product is in an unopened container returnable under Nalco's returned material policy.
- 4) Payment terms for Consigned Product are net [REDACTED]

® PORTA-FEED is a Nalco Company registered trademark.

Click here to remove this box-

Then double-click again under
the box to edit the header
with the customer name

Remote Service Plan

March 12,2020

Water Treatment Program

Prepared for

Company Name
Address

Instructions

This document is a fully customizable WORD document.

This is a tool to allow you to have a discussion with your customer about how remote service may be implemented at their facility when we can't service the business on site.

You should edit the document and then engage the customer in a discussion to ensure you are both prepared to handle the responsibilities outline in the service plan.

Remove this box after you review it

To edit tables on pages 4-7, double-click to open the table and then edit. Click to close



Prepared by

INFORMATION CONTAINED IN THIS
DOCUMENT IS CONFIDENTIAL AND
INTENDED ONLY FOR USE BY THE PARTY
NAMED HEREIN AND NALCO, AN ECOLAB
COMPANY

NALCO Water, An Ecolab Company
1601 W. Diehl Road
Naperville, IL 60563

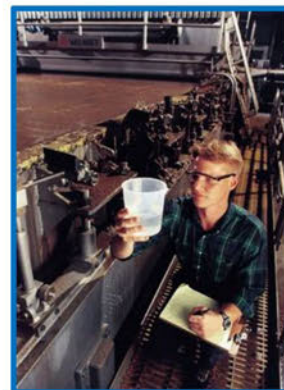
Herein referred to as "Nalco"

Introduction

NalcoWater provides treatment programs that include chemicals, equipment, on-site service, and other components. This is necessary to deliver the outstanding results that you expect. All of these are in alignment to drive the total cost of operation to the optimum point.

There may be times when the on-site service personnel are not able to enter the facility. This may be due to several reasons including labor situations, health related or weather impacted conditions.

Keeping the water related systems up and running is critical for success of the facility.



Routine-On-Site Services



Water treatment systems can range from simple to complex. They can range from HVAC systems to process related additives. Each system usually requires testing, observations, adjustments, and recommendations to keep it functioning in the desired range.

Chemical storage and feed systems are also critical to the operation. Spare parts and calibration procedures are necessary for optimum performance.

System Review

Operational data and system performance provide insight necessary to optimize the water related systems. Reviewing the data that generated is of utmost importance.

Whether the data is generated manually or via automated controllers and sensors, it must be reviewed by trained and knowledgeable people. That review can be conducted remotely if the data is generated and stored in the appropriate locations.



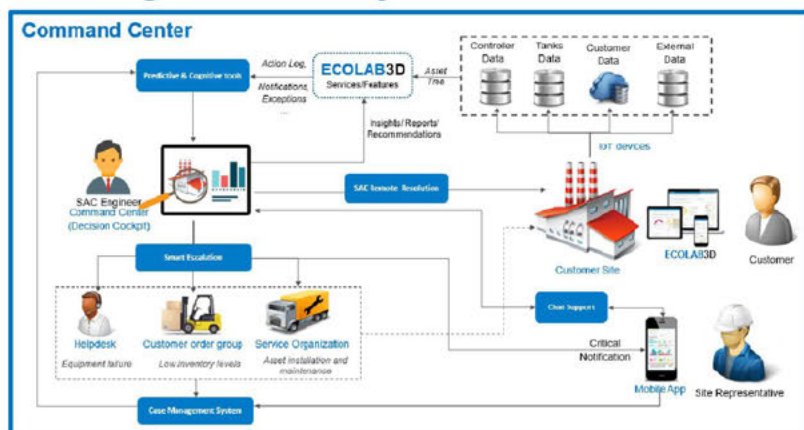
Communication is critical



A robust operational plan provides you the assurance that the systems will function properly. In order to achieve this, we should have clearly defined roles, objectives, outcomes, and escalation plans.

Managing non-standard conditions requires a full commitment in which all parties are aligned with clear line of sight to the outcomes. Communication is critical.

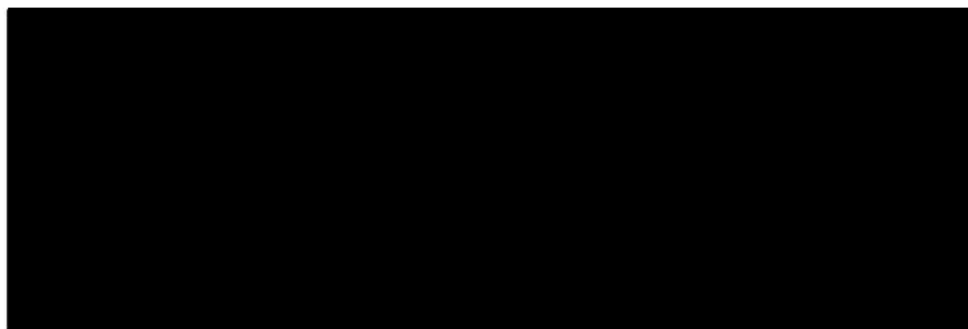
The Digital Journey



Technology is advancing rapidly. Automation, control, and data management is more sophisticated than ever.

You can embark on the digital journey and optimize your water related systems to provide you insight never before imagined.

Automation -



System Assurance Center



With SAC "Remote Dedicated Engineer" service you will have a dedicated team of engineers that know your water system as well as your local team.

This added layer of support and technical expertise combined with the on-site service you receive today, will give you peace of mind that your water systems are always protected and under control.

Collaborate to Succeed

During times that routine onsite service is not able to be conducted by you NalcoWater team, keeping the facility up and running is critically important.

Working together to build out responsibilities and ensuring procedures are in place will minimize the disruption. Working through the priorities will allow both parties to operate during these unique times.



[LINK Excel.Sheet.12 "C:\\Users\\mchmelovski\\Desktop\\COVID 19\\Worksheet.xlsx" Sheet1!R1C1:R33C4
\\a \\f 4 \\h * MERGEFORMAT]

**Remove Box and Enter site
specific information**

[LINK Excel.Sheet.12 "C:\\Users\\mchmelovski\\Desktop\\COVID 19\\Worksheet 2.xlsx" "Page
4!R2C1:R34C3" \\a \\f 4 \\h]



[LINK Excel.Sheet.12 "C:\\Users\\mchmelovski\\Desktop\\COVID 19\\Worksheet 2.xlsx"
Checklist!R2C1:R28C3 \a \f 4 \h]

Comments and Notes:



[LINK Excel.Sheet.12 "C:\\Users\\mchmelovski\\Desktop\\COVID 19\\Worksheet 2.xlsx"
Digital!R2C1:R18C4 la lf 4 lh]

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

ECOLAB INC., and NALCO COMPANY,
LLC d/b/a Nalco Water, an Ecolab Company
and/or Nalco Water,

Plaintiffs,

v.

ANTHONY RIDLEY and CHEMTREAT,
INC.,

Defendants.

No. 1:22-cv-00050-TRM-SKL

Hon. Travis McDonough

Magistrate Judge Susan K. Lee

EXPERT REPORT OF LAURENCE D. LIEB

Introduction

1. My name is Laurence D. Lieb. I am the President of Tyger Forensics Inc., which provides, among other things, computer forensics and electronic discovery services to litigation attorneys and their clients. I am a Magnet Forensics Certified Examiner and a Cellebrite Certified BlackLight Examiner. I am also a licensed private investigator in the State of Michigan.

2. To obtain my certification as a Magnet Forensics Certified Examiner, I undertook online training led by Magnet Forensics. To remain certified, I am required, from time to time, to retrain and pass certification examinations for new software versions. A true and exact copy of my certification is attached as part of **Exhibit A** and incorporated by reference.

3. To obtain my certification as a Cellebrite Certified BlackLight Examiner, I undertook online training led by Cellebrite. To remain certified, I am required, from time to time, to retrain and pass certification examinations for new software versions. A true and exact copy of my certification is attached as part of **Exhibit B** and incorporated by reference.

4. I counsel and assist clients in the preservation, extraction, and analysis of electronic data, using industry-standard practices, based on evidence personally analyzed, and form expert opinions regarding human interaction with electronic data from smartphones, computers, cloud-based sources, and a myriad of other electronic devices. I have been retained for this type of work around the country by numerous clients, as described in my curriculum vitae, which is attached as **Exhibit C**.

5. I have been retained by Ecolab, and its counsel, Fisher & Phillips LLP, to provide expert opinions regarding my forensic analysis of a data loss prevention system report and documents in the litigation titled ECOLAB Inc., and NALCO COMPANY, LLC d/b/a Nalco Water, an Ecolab Company and/or Nalco Water, Plaintiffs, v. ANTHONY RIDLEY, and

CHEMTREAT, INC, pending in the United States District Court, Eastern District of Tennessee, Chattanooga Division (the "Litigation").

6. My hourly rate for this matter varies by task as follows: for pure forensic analysis & reporting, \$350 per hour; for written declarations, depositions, and other sworn testimony, \$450 per hour. My fees are unrelated to the outcome of the Litigation. My curriculum vitae, attached as **Exhibit C**, lists my testimonial experience for the last four years and all my publications for the last ten years.

7. This report is based on my personal knowledge, experience, and expertise in the area of forensic analysis of electronic devices. It is also based on my review of the documents and information contained within Ecolab former employee, Anthony Ridley's OneDrive account and Ecolab's digital loss prevention tool, Digital Guardian's report which captured Anthony Ridley's human interaction with Ecolab's files, and ChemTreat's CrowdStrike report.

8. It is my understanding that the plaintiffs in this case are Ecolab, Inc. and Nalco Company, LLC ("Plaintiffs" or "Ecolab"), and the defendants are ChemTreat, Inc. ("ChemTreat") and a former employee of Plaintiff named Anthony Ridley ("Ridley"). The claims pleaded by the Plaintiff, include (1) theft of trade secrets in violation of the Defend Trade Secrets Act, (2) violation of the Tennessee Uniform Trade Secrets Act, (3) breach of contract, (4) breach of fiduciary duty of loyalty, (5) tortious interference with contractual relationships, (6) procurement of breach of contract, (7) unfair competition, and (8) civil conspiracy. Plaintiffs claim that Ridley misappropriated trade secrets and other confidential information from Ecolab.

9. I understand that discovery is ongoing in this Litigation. I reserve the right to render additional opinions, to supplement or amend the opinions in this report, and to provide additional grounds for those opinions based on my ongoing analysis of the materials provided to me or as may

be required by events that occur during the course of this Litigation, including but not limited to responding to or analyzing positions taken by Ridley or his experts.

Forensic Preservation

10. I used AccessData FTK Imager version 4.5.0.3 to create a bit for bit forensic image of Ridley's Ecolab Microsoft OneDrive account ("OneDrive Account").

11. It is critical to use "Best Practices" when conducting a forensic examination. "Best Practices" are defined as use of industry-standard chain of custody forensic software that will preserve and maintain which specific person has sole control over a specific single source of electronic evidence up to a time and date certain. It also includes the use of tools and methodologies that do not make changes to the underlying electronic evidence in any way. If the proper standardized software is not used, it can result in the underlying data being changed or otherwise distorted. The software, tools, and methodologies that I used to conduct my forensic examination comport with these "Best Practices."

Digital Guardian Report

12. Ecolab employs a data loss prevention tool, Digital Guardian, to journal Ecolab employees' interactions with Ecolab files, specifically to capture and memorialize unauthorized exfiltration of files, such as the downloading and copying of Ecolab files to external USB media, uploading of Ecolab files to non-Ecolab cloud storage services, and the emailing of Ecolab files to 3rd party email accounts. Digital Guardian is designed specifically to record the exfiltration of trade secrets, intellectual property and company files by employees. Furthermore, the Digital Guardian Report contains all the categories of information I seek to analyze and report on in theft of trade secrets matters. The fact that I was not able to forensically analyze Ridley's former Ecolab work computers has literally no effect on my strongly held opinion that Ridley exfiltrated thousands of Ecolab files.

13. Ecolab's data loss prevention tool, Digital Guardian version 8.4.0.0263, generated a report ("Digital Guardian Report") of all interactions former employee Ridley performed regarding Ecolab files during the period May 22, 2021 through July 1, 2021 inclusive. I forensically analyzed the Digital Guardian Report and came to the forensic observations and opinions set forth in this report.

14. The Digital Guardian Report captured and recorded an extensive amount of files being exfiltrated by Ridley using his former Ecolab laptop. From a forensic analysis standpoint, the Digital Guardian Report provides more than sufficient amount of information for me to arrive at my conclusion that Ridley misappropriated thousands of Ecolab files.

Forensic Analysis – Uploading Files to a Personal Microsoft Account

15. Forensic analysis revealed Ridley uploading a file named "fb na sales 2021 exprixe review for customers.pptx" to a personally owned Microsoft account on **5/22/2021 10:05 PM EST** from Ridley's Ecolab workstation, an HP 1030 G2.

16. Forensic analysis revealed Ridley uploading a file named "2021 partnership and market overview.pptx" to a personally owned Microsoft account on **5/22/2021 10:20 PM EST** from Ridley's Ecolab workstation, an HP 1030 G2.

17. Forensic analysis revealed Ridley uploading a file named "2021 partnership and market overview - [REDACTED].pptx" to a personally owned Microsoft account on **5/22/2021 10:32 PM EST** from Ridley's Ecolab workstation, an HP 1030 G2.

18. Forensic analysis revealed Ridley uploading a file named "intensive cleaning procedure covid 19 goggles.docx" to a personally owned Microsoft account on **5/24/2021 11:10 AM EST** from Ridley's Ecolab workstation, an HP 1030 G2.

19. Forensic analysis revealed Ridley uploading a file named “notes for [REDACTED] 2006 contract.doc” to a personally owned Microsoft account on **5/24/2021 1:12 PM EST** from Ridley’s Ecolab workstation, an HP 1030 G2.

20. Forensic analysis revealed Ridley uploading a file named “esisting (*sic*) inventory quote.doc” to a personally owned Microsoft account on **5/24/2021 1:12 PM EST** from Ridley’s Ecolab workstation, an HP 1030 G2.

21. Forensic analysis revealed Ridley uploading a file named “2021 [REDACTED] [REDACTED] example rfp purchase agreement - october 2020.docx” to a personally owned Microsoft account on **6/8/2021 10:55 AM EST** from Ridley’s Ecolab workstation, an HP 1030 G2.

22. Forensic analysis revealed Ridley uploading a file named “[REDACTED] monthly tracking report 06-2021.xlsx” to a personally owned Microsoft account on **6/18/2021 10:13 PM EST** from Ridley’s Ecolab workstation, an HP 1030 G2.

23. I understand that ChemTreat terminated Ridley in March 2022, purportedly after its investigation uncovered the fact that Ridley had emailed an Ecolab file from his personal Microsoft email account to his ChemTreat email account in September 2021. This is consistent with my analysis of the Digital Guardian Report, which uncovered evidence of Ridley uploading Ecolab files to his personal Microsoft account as documented in paragraphs 15 through 22 above.

24. It is my opinion that Ridley exfiltrated the many Ecolab files documented in this report specifically to utilize them while employed at ChemTreat.

Forensic Analysis – Downloading Files to an External LaCie USB Drive

25. Forensic analysis revealed Ridley downloading and copying a significant number of documents and Ecolab data to two separate external USB drives in the two months prior to Ridley’s resignation from Ecolab. I have been informed that Ridley’s last date of employment at Ecolab was July 1, 2021.

26. Forensic analysis revealed Ridley exporting a file named “ridley contacts.csv” from Ridley’s Ecolab Microsoft Outlook account to an external USB drive, USB Association VendorID 090c, serial number 4160000000000000, on 6/21/2021 3:36:00 PM.

27. Forensic analysis revealed Ridley downloading and copying the 9,741 files and folders listed in **Exhibit D** to a removable LaCie brand USB drive (“LaCie Drive”), serial number def10dce9db4, on 6/1/2021.

28. Forensic analysis revealed Ridley downloading and copying the 149 files and folders listed in **Exhibit E** to the LaCie Drive on 5/27/2021.

29. Forensic analysis revealed Anthony Ridley downloading and copying the 185 files and folders listed in **Exhibit F** to the LaCie brand USB drive on 5/26/2021.

30. Forensic analysis revealed Anthony Ridley downloading and copying the 1,798 files and folders listed in **Exhibit G** to the LaCie brand USB drive on 5/25/2021.

31. Forensic analysis revealed Anthony Ridley downloading and copying the 4,891 files and folders listed in **Exhibit H** to the LaCie brand USB drive on 5/24/2021.

Forensic Analysis of Three USB Drives

32. I was provided with three USB drives belonging to Ecolab which Anthony Ridley kept after his employment with Ecolab ended. I further understand that Ridley returned these drives to Ecolab after Ecolab’s counsel demanded that they be returned. In fact, these three drives were sent to me directly by Ridley’s counsel. Upon receipt of the drives, I generated industry standard bit-for-bit forensic images of each drive. The makes, models and serial numbers of the three USB drives are listed below in Table 1 and are incorporated herein by reference.

Table 1 – Three USB Drives

EVIDENCE #	MAKE/MODEL	SERIAL NUMBER
USB001	UDisk	6&25676984&0&_&0

USB002	USB Flash Disk	0416080000012762 Revision: 1100
USB003	USB DISK 2.0	910101099030

33. Forensic analysis revealed that Anthony Ridley created a folder on drive USB001 named “Files from Ridley's personal computer” on 2/9/2022 3:34:01 PM, which I understand was after Mr. Ridley received a cease-and-desist letter from Ecolab’s counsel earlier that same day.

34. Forensic analysis revealed a file named “_esktop.ini” on drive USB001 with a file creation date of 2/9/2022 3:34:01 PM. “_esktop.ini” is a Windows system file which normally is only found in the desktop folder of a Windows computer. Therefore, it is my expert opinion that Anthony Ridley copied this “_esktop.ini” file from a Windows computer’s desktop folder to drive USB001 on 2/9/2022 3:34:01 PM.

35. Forensic analysis revealed multiple deleted files on drive USB001. A complete list of the deleted folders and files recovered from drive USB001 is listed below as Table 2 and is incorporated herein by reference. In my opinion, Mr. Ridley deleted the files listed below in Table 2 in a failed attempt to hide the fact that the drive contained Ecolab files.

Table 2 – Deleted Folders and Files Recovered from Drive USB001

Deleted Folder or File Name	Location on Drive USB001
_ESKTOP.INI	USB001:\Files from Ridley's personal computer\Music\
_ESKTOP.INI	USB001:\Files from Ridley's personal computer\Pictures\
Sales Plan Strategies.pdf	USB001:\Sales Planning Tools\Planning Guides\
██████████ Boiler Operator Training Final 4kwk.ppt	USB001:\
Proposal for ██████████ Program 121417EC (002) - December 2017.pdf	USB001:\
~\$ ██████████ Boiler Operator Training Final 4kwk.ppt	USB001:\
Sales Tactics.pdf	USB001:\Sales Planning Tools\Planning Guides\
██████████ Boiler Operator Training Final 4kwk.ppt	USB001:\
~\$ ██████████ Boiler Operator Training Final 4kwk.ppt	USB001:\
Call Planner (Pads).docx	USB001:\Sales Planning Tools\Sales Plans\
Sales Plan Overview.docx	USB001:\Sales Planning Tools\Sales Plans\

Activity Log.docx	USB001:\Sales Planning Tools\Sales Plans\
Target Account Assessment.docx	USB001:\Sales Planning Tools\Sales Plans\
_.H2W	USB001:\
Sales Planning Tools	USB001-ANTHONY-RIDLEY.E01\Root\Sales Planning Tools\
Planning Guides	USB001-ANTHONY-RIDLEY.E01\Root\Sales Planning Tools\Planning Guides\
Sales Plans	USB001-ANTHONY-RIDLEY.E01\Root\Sales Planning Tools\Sales Plans\

36. Forensic analysis revealed Anthony Ridley's deletion of a file named "[REDACTED] Boiler Operator Training Final 4kwk.ppt" from drive USB001 on 02/09/2022.

37. Forensic analysis revealed Anthony Ridley's deletion of a file named "Sales Plan Strategies.pdf" from drive USB001 on 02/09/2022.

38. Forensic analysis revealed Anthony Ridley's deletion of a folder named "Planning Guides" from drive USB001 on 02/09/2022.

39. Forensic analysis revealed Anthony Ridley's deletion of a file named "Ridley Contacts.CSV" from drive USB002 on 02/09/2022. In fact, this "Ridley Contacts.CSV" appears to be the exact same file Ridley exfiltrated from Ecolab on 6/21/2021 3:36:00 PM as memorialized in the Digital Guardian Report.

40. Therefore, it is my expert opinion that Ridley attempted, but failed to hide the fact that he was in possession of the above-mentioned Ecolab files.

Forensic Analysis of the Anthony Ridley OneDrive Account

41. Forensic analysis of Ridley's Ecolab OneDrive account uncovered the fact that Ridley exfiltrated and then destroyed a significant number of Ecolab files in an attempt to deprive his former employer access to these same files.

42. I first made a forensic image of Anthony Ridley's Ecolab OneDrive account contents using AccessData's FTK Imager version 4.5.0.3 to enable forensic analysis of this evidence.

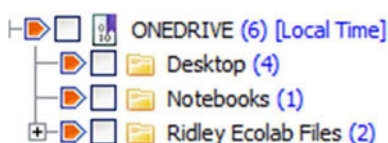
43. Forensic analysis of the Ridley OneDrive account forensic image revealed the fact that, after downloading and copying the folders and files described above in paragraphs 23 through 29, Anthony Ridley deleted all these same folders and files from his Ecolab OneDrive account.

44. Forensic analysis revealed the fact that Ridley's Ecolab OneDrive account originally held four top level folders, named "Desktop", "Notebooks", "Ridley's Ecolab Files" and "ridley's nalco folder" respectively.

45. The screenshot below from my forensic tool shows the current top level folder structure of Ridley's OneDrive account at the time I created a forensic image of the account. Forensic analysis revealed the fact that all the folders and files Ridley deleted from his Ecolab OneDrive account existed under a single the top-level folder named "ridley's nalco folder." This now deleted "ridley's nalco folder" folder would have existed in the screenshot below immediately under the "Ridley Ecolab Files" folder but for the fact that Ridley deleted the "ridley's nalco folder" folder from his Ecolab OneDrive account after downloading the "ridley's nalco folder" folder and the folder's contents to the LaCie drive.

Screenshot of Ridley OneDrive Account at time of Forensic Collection Showing Missing and

Deleted "ridley's nalco folder"



46. Forensic analysis revealed the fact that Ridley deleted the top level “ridley’s nalco folder” after uploading the three files identified in paragraphs 15, 16 and 17 to Ridley’s personal Microsoft cloud account.

47. Forensic analysis revealed the fact that prior to Ridley’s deletion of the top level “ridley’s nalco folder,” Ridley’s entire Ecolab OneDrive account contained 18 gigabytes of files.

48. I have been informed that Ridley asserts that he deleted the files in order to “declutter” his OneDrive account. It is my opinion that there was absolutely no need to “declutter” his OneDrive account, but in fact this act of deletion was designed to deprive Ecolab access to these same files.

49. I have been informed that ChemTreat wiped beyond recovery all content of Anthony Ridley’s ChemTreat work computer. Forensic analysis of the Ridley ChemTreat work computer before it was wiped could have revealed evidence of Ridley downloading Ecolab files to his ChemTreat work computer from Ridley’s personal Microsoft account and evidence of Ridley accessing and copying information from the exfiltrated Ecolab files stored within Ridley’s personal Microsoft account to newly created ChemTreat files.

50. Therefore, in my opinion, and all evidence is consistent with the fact that Ridley exfiltrated thousands of Ecolab files and then deleted those same files to deprive Ecolab access to them.

ChemTreat’s CrowdStrike Report - CHEMR-000002195.XML

51. I was provided with a document produced by ChemTreat labeled as CHEMR-000002195.xml, which represents a CrowdStrike report containing some actions performed by Anthony Ridley while employed at ChemTreat. I performed a forensic analysis of CHEMR-000002195.xml and discovered the following evidence.

Missing AmazonBasics USB Drive Serial Number 180129000600

52. Forensic analysis of the CrowdStrike report revealed the fact that Anthony Ridley disconnected an AmazonBasics external USB drive, serial number 180129000600, on 2021-07-09 T10:21:37.103+0000 (“UTC”) from his ChemTreat laptop.

CHEMR-000002195.XML CrowdStrike Report Reveals an AmazonBasics USB Drive

```
</result>
<result offset='1500102'>
  <field k='_time'>
    <value><text>2021-07-09T10:21:37.103+0000</text></value>
  </field>
  <field k='name'>
    <value><text>DcUsbDeviceDisconnectedV2</text></value>
  </field>
  <field k='DeviceManufacturer'>
    <value><text>AmazonBasics</text></value>
  </field>
  <field k='DeviceProduct'>
    <value><text>AmazonBasics Hard Drive Enclos</text></value>
  </field>
  <field k='DeviceSerialNumber'>
    <value><text>180129000600</text></value>
  </field>
```

53. As of the date of this Expert Report, I have not been provided with a forensic image of this particular USB drive.

Ridley Accessed His Personal Microsoft Account Using His ChemTreat Laptop

54. Forensic analysis of CHEMR-000002195.xml identified the fact that Anthony Ridley accessed his personal Microsoft account by visiting “cdn.odc.officeapps.live.com” on 2021-10-30 T21:20:51.298+0000 (UTC). Live.com is Microsoft’s website for individual, non-organizational customers of Microsoft online email and document storage services.

55. Forensic analysis revealed that less than one minute later, Ridley accessed a file named “EMS-103A Empty Container Requirements.docx” in his ChemTreat OneDrive folder named “Arnold Air Force Base\HVAC bid - 2021\” at 2021-10-30 T21:21:14.030+0000 (“UTC”).

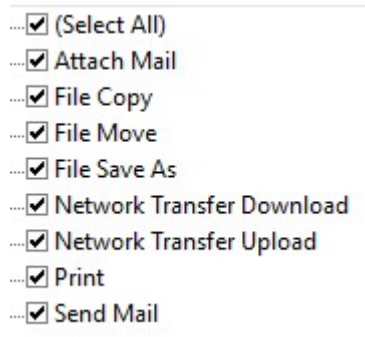
56. It is my opinion that this is evidence of Ridley accessing the exfiltrated Ecolab files from his personal Microsoft OneDrive account in order to use the content of the exfiltrated files.

57. Arnold Air Force Base was one of the customers whose files were uploaded by Ridley to his personal Microsoft account from Ridley’s former Ecolab work computer on May 24, 2021.

58. In my opinion, the CrowdStrike tool, unlike the Digital Guardian tool, is not a data loss prevention tool. In fact, I spoke with three CrowdStrike representatives on February 7, 2023 who confirmed the fact that CrowdStrike does not hold itself out to be a data loss prevention tool developer. The CrowdStrike representatives stated that developing and offering a data loss prevention tool is planned for the future.

59. For example, the Digital Guardian tool recorded many types of human file interaction commonly used by employees to exfiltrate data as seen in the screenshot below. In contrast, the CrowdStrike tool does not record “attaching mail”, “Network Transfer Download”, “Network Transfer Upload”, “Print”, or “Send Mail”.

Digital Guardian Human Activity Recorded



60. Forensic analysis of the now wiped ChemTreat laptop would have provided the detail as to which specific exfiltrated Ecolab files Ridley was accessing from his personal Microsoft OneDrive account while interacting with the related ChemTreat files. Therefore, searches for the exfiltrated Ecolab file names within ChemTreat's email and OneDrive system alone will not uncover the Ecolab information Ridley used to while employed at ChemTreat.

Dated: February 24, 2022

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laurence D. Lieb". The signature is written in a cursive, flowing style.

Laurence D. Lieb